

Self-Implementation On-site Cleanup & Disposal of PCB Remediation Waste Workplan

**Fulton Commercial @ 330 Commercial Avenue
Block 292.01 Lot 1.05
330 Commercial Avenue
New Brunswick, Middlesex County, New Jersey 08901
NJDEP PI No. 244730**

Prepared for:

330 Commercial Avenue, LLC
1260 Stelton Road
Piscataway, New Jersey 08854

Prepared by:



RTP Environmental Associates, Inc.
239 US Highway 22 East
Green Brook, New Jersey 08812
(732) 968-9600

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TABLE OF CONTENTS

1.0 INTRODUCTION	1
2.0 SITE BACKGROUND AND HISTORY	2
3.0 PHYSICAL SETTING	3
3.1 Geology	3
3.2 Hydrogeology	4
3.0 NATURE OF CONTAMINATION - 40 CFR 761.61(a)(3)(i)(A).....	5
3.1 Soil.....	5
3.2 Groundwater	5
4.0 SITE CHARACTERIZATION DATA - 40 CFR 761.61(a)(3)(i)(B)	6
4.1 Soil.....	6
4.2 Groundwater	6
5.0 LOCATION AND EXTENT OF CONTAMINATION - 40 CFR 761.61(a)(3)(i)(C)	8
6.0 CLEANUP PLAN, SCHEDULE, DISPOSAL & APPROACH - 40 CFR 761.61(a)(3)(D)	9
6.1 Proposed Cleanup Plan, Approach, and Disposal	9
6.2 Temporary Staging of PCB Contaminated Soil Prior to Disposal	10
6.3 Equipment Decontamination	11
6.4 Engineering Control	12
6.5 Deed Restriction	12
6.6 Remediation Schedule	12
6.7 Certification – Technical Submittal	13

LIST OF TABLES

Table 1	Historical Soil Sample Analytical PCB Results Data Summary (Tetra Tech)
Table 2	Soil Sample Analytical PCB Results Data Summary (RTP)
Table 3	Groundwater Sample Analytical Result Data Summary

LIST OF FIGURES

Figure 1	Site Location Map
Figure 2	Site Plan - Areas of Concern (AOC) Inventory Map
Figure 3	Soil Sample Locations Plan – Illustrating Historical PCB Soil Sample Locations
Figure 4	Soil Sample Locations Plan – Illustrating RTP’s PCB Soil Sample Locations
Figure 5	Monitoring Well Locations Plan
Figure 6	Conceptual Site Model with Proposed Development
Figure 7	Proposed PCB Impacted Soils Excavation Areas
Figure 8	Proposed Post-Excavation Sample Locations for Area 330-A
Figure 9	Proposed Post-Excavation Sample Locations for Area 330-B
Figure 10	Capping Detail

LIST OF APPENDICES

Appendix I	Site Investigation/Remedial Investigation Report July 2017 (CD only)
Appendix II	PCB Contaminated Soil Stockpile Detail
Appendix III	Draft Deed Notice
Appendix IV	Report Certification (40 CFR 761.61(a)(3)(E))

1.0 INTRODUCTION

On behalf of 330 Commercial Avenue, LLC, the current property owner, RTP Environmental Associates, Inc. (RTP) is submitting the required 30-day Notification of PCB Activity and information in support of the proposed soil remedial action for Polychlorinated Biphenyls (PCB)-contaminated soil in accordance with 40 CFR 761.61- Subpart D – Storage and Disposal of PCB remediation waste.

The Fulton Commercial @ 330 Commercial Avenue site is currently listed with the New Jersey Department of Environmental Protection (NJDEP) under the Licensed Site Remediation Professional (LSRP) Program and all other known site environmental issues are being addressed through the LSRP Program in accordance with the NJDEP Technical Requirements for Site Remediation (N.J.A.C. 7:26E). The NJDEP Site Remediation Program (SRP) Preferred Identification (PI) Number is 244730.

The site is located at 330 Commercial Avenue, New Brunswick, Middlesex County, New Jersey. A site location map is provided as **Figure 1**. The site occupies a parcel that is identified in the City of New Brunswick tax records as Block 292.01, Lot 1.05. The site is approximately 2.49 +/- acres in size. A site plan and an Area of Concern (AOC) Inventory of the site is provided as **Figure 2**. RTP investigated the site between April 2009 and present and Mr. John Larkins of RTP currently serves as the LSRP for the site. Prior to RTP involvement, Brinkerhoff Environmental Services, Inc. (BES) prepared a Preliminary Assessment (PA) for the site in 2007.

The following six (6) areas of concern (AOCs) were identified at the site.

AOC A1	Former 1,000-Gallon Gasoline Underground Storage Tank (UST)
AOC D1	Stockpiled Soils
AOC E1	Flood Area
AOC G1	Former Coal Storage Bin
AOC G2	Residual Site Wide Soil Contamination/Railroad Spur and Trestle/Historic Fill
AOC G3	Site Wide Groundwater Contamination

The above AOCs are being addressed through the NJDEP Site Remediation Program (SRP). RTP's Site Investigation / Remedial Investigation Report dated July 2017 is provided as **Appendix I**.

Please note that the source of the onsite PCB contamination identified has migrated onto the site from the property adjacent to the northeast and identified as the former Mack Iron and Metal located at 320 Commercial Avenue in New Brunswick, NJ. This Self-Implementation On-site Cleanup & Disposal of PCB Remediation Waste Workplan is for the subject site only. The former Mack Iron and Metal site was a metal recycling facility.

2.0 SITE BACKGROUND AND HISTORY

The property is currently owned by 330 Commercial Avenue LLC. of Piscataway, New Jersey (since 2004). The property is currently undeveloped and vacant. From 1950s to 1989 it was used for commercial purposes as trolley right of way and a railroad trestle. The proposed property use is residential (condominiums with parking and landscaped areas).

The initial discovery of PCB contamination occurred in 2006 the site investigation soil sampling was conducted by Tetra Tech Environmental. Among other contaminants, PCBs were identified in excess of the formerly applicable NJ Soil Cleanup Criteria (SCC). The highest PCB contamination was detected along the property line between the subject site and the former Mack Iron and Metal site located at 320 Commercial Avenue, New Brunswick, NJ, which was determined to be the source of the PCB contamination at the subject property. A site plan showing the location of the PCBs contamination is provided as **Figure 3**.

Even though the PCB contamination is from an off-site source, the current owner of the property 330 Commercial Avenue, LLC is proposing to remove the PCB-impacted soil in excess of 10 ppm in accordance with EPA's self-implementing on-site cleanup and disposal of PCB remediation waste regulations (40 CFR 761.61(a)). Following the removal of PCBs in excess of 10 mg/kg, a deed notice shall be filed as an institutional control, followed by the installation of an engineering control in the form of a cap that meets the requirements of 330 Commercial Avenue, LLC estimates that the remediation will commence approximately 30 days after USEPA approval.

3.0 PHYSICAL SETTING

3.1 Geology

The Property is located within the Piedmont Plain. The Piedmont Plain is located east and southeast of the Highlands and extends southeast to the Coastal Plain. Sometimes referred to as plateau of lowland, it is hilly to rolling plains with elevation increasing to the northwest. In the vicinity of New Brunswick, Somerville, and Bound Brook, flat to undulating relief features are present with elevations reaching 100 feet to 130 feet above sea level. Boundaries of the Piedmont Plain are coincident with those of the Newark Basin. The Triassic-age and Jurassic-age sedimentary rocks commonly referred to as the Newark Group occupy New Brunswick.

The Property is underlain by the Passaic Formation. The Passaic Formation is described as predominantly grayish-red to reddish-brown, evenly to irregularly bedded, thin to thick-bedded shale, siltstone, very fine to coarse grained sandstone, and red matrix conglomerate. The Passaic Formation thickness ranges from 8,760 to 19,685 feet.

According to the Soil Survey of Middlesex County prepared by the United States Soil Conservation Service (SCS, 1987: Sheet 18), the soils within the Site are classified as Nixon loam (NknB) and Nixon-Urban land complex (NkpB). A Site Soils Map is provided in **Figure 2**. Each of these soil types is described below:

- **Nixon loam (NknB)** – This soil series consists of deep, well drained soils that formed in acid, moderately fine textured Coastal Plan sediments. The Nixon soils are on high terraces, divides, and side slopes. The permeability is moderate in the subsoil and moderately rapid in the substratum. Available water capacity is moderate. The water table is rarely perched in the subsoil for more than a few hours. Erosion hazard is slight. This soil is generally suitable for most urban uses.
- **Nixon-Urban land complex (NkpB)** – This soil series consists of deep, well drained soils that formed in acid, moderately fine textured Coastal Plan sediments. The Nixon soils are on high terraces, divides, and side slopes. The permeability is moderate in the subsoil and moderately rapid in the substratum. Available water capacity is moderate. The water table is rarely perched in the subsoil for more than a few hours. Erosion hazard is slight. About 60 percent is covered with buildings and other impervious surfaces. The remainder 40 percent Nixon variant is mainly in yards and around and between structures. The disturbed areas are sandy and droughty.

The ground surface of the property is generally level, with an incline near the southeastern border. Elevations range from 86 to 92 feet above sea level. The site is relatively low-lying with a high water table. Part of the site in the northern corner lies below the water table and is consistently flooded. This area is identified as an AOC which is discussed further in section 3.3.

3.2 Hydrogeology

No streams or body of water are located at the subject property. A Mile Run Tributary runs NW-SE approximately 65 ft. southwest and along the southwestern property boundary. No wetlands are present at or adjacent to the site. Based upon previous investigations conducted at the site, the depth to groundwater ranges between 1.5 to 3 ft in the western portion of the site and approximately 6 feet in the eastern portion of the site. Groundwater flow is generally to the west-northwest.

3.0 NATURE OF CONTAMINATION - 40 CFR 761.61(a)(3)(i)(A)

3.1 Soil

The subject site or portions thereof have been investigated and remediated by RTP and others at numerous various times since circa 2006.

A total of 200 soil samples were collected for at the subject site during the Site Investigation, Remedial Investigation, and Remedial Action activities conducted between June and July 2006. Additionally, 12 soil samples were collected and analyzed for PCBs during the additional SI activities conducted by RTP in April/May 2009 and July 2013.

PCBs were detected in soil samples collected throughout the site at concentrations ranging from non-detect to 200 mg/kg in sample FS-71. The highest PCB soil concentrations (exceeding 10 mg/kg) were detected along the property line with the former Mack Iron and Metal site. These PCB concentrations range between 13 mg/kg and 200 mg/kg. **Table 1** is a summary of samples collected at the site for PCB analysis. The PCBs soil sample locations and analytical results exceeding 10 mg/kg are shown on **Figures 3**.

3.2 Groundwater

Groundwater quality has been primarily characterized through previous groundwater sampling conducted by RTP in April and July 2013. Previous groundwater sampling documented no PCBs found in the groundwater at any of the existing monitoring well locations (MW-1 through MW-4). The analytical results for the groundwater samples collected by RTP are summarized on **Table 2**. RTP believes the groundwater at the site in relation to this specific area of concern has been adequately characterized, and further analysis is not warranted at this time.

Details regarding the groundwater sampling are provided in Section 4.2 below.

4.0 SITE CHARACTERIZATION DATA - 40 CFR 761.61(a)(3)(i)(B)

4.1 Soil

Environmental site conditions with respect to PCBs have been primarily characterized through previous soil sampling conducted by Tetra Tech in June and July 2006. Previous soil sampling documented the highest PCB soil concentrations along the property line with the former Mack Iron and Metal site to range between 13 mg/kg and 200 mg/kg. Low level PCBs contamination ranging from non-detect to 9.1 mg/kg was identified throughout the site. The analytical results for the soil samples collected by Tetra Tech are summarized on **Table 1**.

Additionally, 12 soil samples were collected and analyzed for PCBs during the additional SI activities conducted by RTP in April/May 2009 and July 2013. The analytical results for the soil samples collected by RTP are summarized on **Table 2**.

The surface and subsurface soil samples collected between June 2006 and July 2013 were collected using a variety of methodologies, including hand tools (shovels and garden trowels), Geoprobe and an excavation machine (backhoe). Upon collection, the soil samples were stored on ice in a cooler until delivery to a refrigerator/freezer (at the office), and then ultimately to the laboratory. The samples were submitted to the Sever Trent Laboratories (STL) of Edison, New Jersey and Accredited Analytical Resources (Accredited) of Carteret, New Jersey. STL and Accredited are certified by the State of New Jersey to perform the analysis (Certification #30909 and #12007, respectively). The soil samples were analyzed for PCBs via US EPA Method No. 8082.

4.2 Groundwater

Four (4) monitoring wells MW-1 through MW-4 exist at the subject site. To date, a total of two (2) groundwater sampling rounds were conducted for PCB analysis. Both rounds (April 24, 2013 and July 25, 2013) included all four (4) monitoring wells. The monitoring well location map is provided as **Figure 4**. Details regarding well specifications, sampling and analytical results are provided below.

Monitoring wells MW-1 through MW-4 were installed by a licensed New Jersey driller from Foresight Enviroprobe of Freehold, NJ, and under supervision of RTP's representative.

Monitoring well MW-1 was installed to a depth of 13 ft. bsg using air rotary drilling method. The well was constructed with 12-feet of 2-inch diameter PVC screen (1-13 ft. bsg), screened across the water table (groundwater was encountered at 2 ft. bsg), and the remainder solid PVC casing.

Monitoring well MW-2 was installed to a depth of 11 ft. bsg using air rotary drilling method. The well was constructed with 10-feet of 2-inch diameter PVC screen (1-11 ft. bsg), screened across the water table (groundwater was encountered at 2 ft. bsg), and the remainder solid PVC casing.

Monitor well MW-3 was installed to a depth of 10 ft. bsg using air rotary drilling method. The well was constructed with 9-feet of 2-inch diameter PVC screen (1-10 ft. bsg), screened across the water table (groundwater was encountered at 4 ft. bsg), and the remainder solid PVC casing.

Monitor well MW-4 was installed to a depth of 12 ft. bsg using air rotary drilling method. The well was constructed with 10-feet of 2-inch diameter PVC screen (2-12 ft. bsg), screened across the water table (groundwater was encountered at 3 ft. bsg), and the remainder solid PVC casing.

Upon completion the wells were finished flush with the existing grade. Following installation, the wells were developed by pumping until a clear discharge was obtained. The groundwater was allowed to equilibrate for more than 2 weeks and was sampled on April 24, 2013 followed by a second round of sampling conducted on July 25, 2013.

The groundwater samples were collected from all four monitoring wells utilizing volume-averaged sampling method (April 24, 2013) and low-flow sampling methodology (July 25, 2013). Upon collection, the groundwater samples were stored on ice in a cooler until delivery to a refrigerator/freezer (at the office), and then ultimately to the laboratory. The samples were submitted to Accredited. The groundwater samples were analyzed for PCBs via US EPA Method No. 8082. The analytical results are summarized in **Table 3**. The analytical results indicated no PCB impact above the laboratory Method Detection Levels (MDLs).

5.0 LOCATION AND EXTENT OF CONTAMINATION - 40 CFR 761.61(a)(3)(i)(C)

Based upon all of the soil and groundwater sampling conducted at the site in 2006, there is extensive low level (up to 10 mg/kg) PCB impact in soil on majority of the site, with several “hot-spot” areas with PCB concentrations between 10 mg/kg and 200 mg/kg along the northeastern property line between the subject site and the former Mack Iron and Metal. The PCB contamination was determined to have migrated from the adjoining property, former Mack Iron and Metal. Soil sampling results are summarized in **Table 1** and **Table 2**. The locations of the PCB soil samples collected to date are shown on **Figure 3**.

6.0 CLEANUP PLAN, SCHEDULE, DISPOSAL & APPROACH - 40 CFR 761.61(a)(3)(D)

6.1 Proposed Cleanup Plan, Approach, and Disposal

FSUR proposes to remediate all soil impacts to a PCB cleanup criterion of 10 mg/kg. The proposed 10 mg/kg is based upon the USEPA remediation standard for the high-occupancy areas. The proposed excavation areas are shown on **Figure 6**.

All PCB impacted soils above this level will be removed from the site for offsite disposal at a USEPA licensed disposal facility. All PCB contaminated soil will be transported offsite by a licensed transporter. The proposed disposal facilities for the soils and concrete exhibiting PCB levels greater than 10 mg/kg will be:

Heritage Environmental
4370 W County Road 1275 N
Roachdale, IN 46172
(765) 435-2704

US Ecology
49350 N. Interstate 94 Service Drive
Belleville, MI 48111
(800) 592-5489

Chemical Waste Management Chemical Services
1550 Balmer Road
Model City, NY 14107

Waste Management, Inc.
Alabama Inc. Box 55
Emelle AL 35459
(205) 652-9721

Republic Waste Services of Texas Limited (AKA Republic CSC Landfill)
101 Republic Way, PO Box 236
Avalon, TX 76623

According to the 40 CFR § 761.61(a)(6) selection of sample locations should be based on a square-based grid system, which should overlie the entire area to be sampled. The grid must be oriented on a magnetic north-south line centered in the areas and an east-west axis perpendicular to the magnetic north-south axis also centered in the area. A series of sampling points 1.5 meters apart oriented to the grid axes should be marked out. The sampling points must proceed in every direction to the extent sufficient to result in a two-dimensional grid completely overlaying the sampling area. A minimum of three soil samples per each separate cleanup site is required.

However, because of the large size of the proposed excavation areas (10,400 sq. ft.) RTP proposes to reduce the post-excavation soil sampling frequency to by using a grid with sampling points 3

meters (or approximately 10 ft.) apart oriented to the grid axes. The sampling points will proceed in every direction to the extent sufficient to result in a two-dimensional grid completely overlaying the sampling area. The samples that fall onto the excavation sidewalls will be collected from the depth corresponding to the depth of the initial PCB samples that exhibited concentrations in excess of 10 mg/kg.

The post excavation samples will be grab samples. The proposed post-excavation soil sample locations for each area to be excavated (Area 330-A and Area 330-B) are shown on **Figure 8** and **Figure 9**. All excavation sidewall samples will be collected from 0 to 0.5 ft. bgs. All excavation base samples will be collected from 1 to 1.5 ft. bgs. A summary of the proposed number of soil samples and their designations for each proposed excavation area is presented below:

Area of excavation	Dimensions	Number of post excavation samples	Post excavation sample designations	Sample depth in ft bgs.
Area 330-A	300 ft. x 28 ft. x 1 ft. deep	106	AS-1 through AS-42 AB-1 through AB-64	0-0.5 1-1.5
Area 330-B	45 ft. x 44 ft. x 1 ft. deep	24	BS-1 through BS-9 BB-1 through BB-15	0-0.5 1-1.5

All post-excavation soil samples will be analyzed for PCBs utilizing USEPA Method 8082 by a State of New Jersey certified laboratory. Following confirmation that all PCBs exceeding 10 mg/kg have been removed for offsite disposal, the excavations shall be backfilled with certified clean fill as per NJDEP guidance.

6.2 Temporary Staging of PCB Contaminated Soil Prior to Disposal

FSUR proposes to temporarily store the excavated soil on site. The PCB contaminated soil shall be placed on a 20-mil plastic liner and the covered with a 20-mil plastic liner. Every day after excavation activities have occurred the stockpile shall be surrounded with hay bales and covered with 20-mil plastic liner, please see the attached PCB Contaminated soil stockpile diagram detail provided in **Appendix II**. Once post-excavation soil samples have confirmed all of the PCB contaminated soil has been excavated, offsite soil disposal activities shall commence. Additionally, FSUR shall conduct any necessary items as stated below:

- 1). Bulk PCB remediation waste or PCB bulk product waste may be stored at the clean-up site or site of generation for 180 days subject to the following conditions:
 - (i) The waste is placed in a pile designed and operated to control dispersal of the waste by wind, where necessary, by means other than wetting.
 - (ii) The waste must not generate leachate through decomposition or other reactions.
 - (iii) The storage site must have:
 - (A) A liner that is designed, constructed, and installed to prevent any migration of wastes off or through the liner into the adjacent subsurface soil, ground water or surface water at any time during the active life (including the closure period) of the storage site. The liner

may be constructed of materials that may allow waste to migrate into the liner. The liner must be:

- (1) Constructed of materials that have appropriate chemical properties and sufficient strength and thickness to prevent failure due to pressure gradients (including static head and external hydrogeologic forces), physical contact with the waste or leachate to which they are exposed, climatic conditions, the stress of installation, and the stress of daily operation.
 - (2) Placed upon a foundation or base capable of providing support to the liner and resistance to pressure gradients above and below the liner to prevent failure of the liner due to settlement, compression, or uplift.
 - (3) Installed to cover all surrounding earth likely to be in contact with the waste.
- (B) A cover that meets the requirements of paragraph (c)(9)(iii)(A) of this section, is installed to cover all of the stored waste likely to be contacted with precipitation, and is secured so as not to be functionally disabled by winds expected under normal seasonal meteorological conditions at the storage site.
- (C) A run-on control system designed, constructed, operated, and maintained such that:
- (1) It prevents flow onto the stored waste during peak discharge from at least a 25-year storm.
 - (2) It collects and controls at least the water volume resulting from a 24-hour, 25-year storm. Collection and holding facilities (e.g., tanks or basins) must be emptied or otherwise managed expeditiously after storms to maintain design capacity of the system.

6.3 Equipment Decontamination

FSUR proposes to conduct the following decontamination procedures on the excavation equipment bucket and any other applicable sampling equipment:

Decontamination procedure shall be performed over a containment area to collect rinsate water after the excavation bucket has been scraped with shovel:

- 1) Pressure wash to remove remaining debris;
- 2) Detergent wash and rinse (potable water);
- 3) Alcohol rinse;
- 4) Air dry;
- 5) Followed by final rinse.
- 6) Rinsate water shall be collected in 55-gallon drums and removed off site for proper disposal.
- 7) Wipe samples shall be collected for verification to confirm compliance with a decontamination standard of 10 micrograms per 100 square centimeters.

6.4 Engineering Control

Upon analytical confirmation that all PCB impacted soil has been removed to a level 10 mg/kg or less, the site shall be capped with an engineering control as follows:

- Areas to be developed with roads and paved parking lots (asphalt cap): shall be capped with a minimum of 6 inches of asphalt.
- Areas to be developed with buildings or sidewalks (concrete cap): shall be capped with a minimum of 6 inches of concrete.
- Areas to be developed with landscaping (vegetation cap): shall be capped with 10 inches of clay as per the USEPA regulation followed by a minimum of 12 inches of certified clean top soil, followed by either mulch or grass seed.

Municipal approval of the future site development has not currently been obtained. Therefore the exact placement of the engineering control has not been determined. The details of the cap are provided on **Figure 10**.

6.5 Deed Restriction

Following the successful completion of remedial activities, a Remedial Action Report will be submitted to the USEPA. The engineering control will be established for the remaining PCB-impacted soil at concentrations between 1 and 10 mg/kg as well as the Historic Fill contamination regulated by the NJDEP. A deed notice will be filed with the county clerk and shall conform to all applicable government requirements. A copy of the filed deed notice shall be included in the submitted Remedial Action Report. A draft deed notice is provided as **Appendix III**. This draft deed notice was prepared based on unapproved Conceptual Site Model.

Following the remedial activities and the filing of the deed notice, 330 Commercial Avenue, LLC shall obtain a Remedial Action Permit – Soils from the NJDEP. The permit shall require annual inspections of the engineering control and the submittal of biennial inspection reports to identify the integrity of the engineering control and detail any repairs and or disturbances made to the engineering control.

6.6 Remediation Schedule

The remediation shall commence approximately 30 days following USEPA approval of this Self-Implementation On-site Cleanup & Disposal of PCB Remediation Waste Workplan. The soil excavation and offsite disposal activities shall be completed approximately 120 days after commencement. The engineering control shall be installed within 1 year after soil excavation activities to allow for municipal site plan approval.

A comprehensive Health & Safety Plan shall be prepared in accordance with CFR 29 Part 1910 prior to the commencement of site remedial activities.

6.7 Certification – Technical Submittal

The written/signed certification in accordance with 40 CFR 761.61(a)(3)(E) signed by the current owner of the property and the party conducting the cleanup indicating that information provided in this document are accurate is provided in **Appendix IV**.

TABLES

TABLE 1
PAGE 1 OF 7

HISTORICAL SOIL ANALYTICAL PCB DATA SUMMARY TABLE
JUNE-JULY 2006

FULTON COMMERCIAL @ 330 COMMERCIAL AVENUE
330 COMMERCIAL AVENUE
NEW BRUNSWICK, NEW JERSEY 08901
NJDEP PI No. 244730

Sample ID	FB-01	FB-02	FB-03	FB-04	FB-05	FB-06	FB-07	FB-08	FB-09	FB-10	NJ Residential Direct Contact Soil Remediation Standard (mg/kg)	NJ Non- Residential Direct Contact Soil Remediation Standard (mg/kg)	NJ Default Impact to Ground Water Soil Screening Level (mg/kg)
Date Samples	6/13/06	6/13/06	6/13/06	6/13/06	6/13/06	6/13/06	6/13/06	6/13/06	6/13/06	6/13/06			
Matrix	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil			
Sample Depth (ft)	0.5-1	0.5-1	0.5-1	0.5-1	0.5-1	0.5-1	0.5-1	0.5-1	0.5-1	0.5-1			
Units	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg			
PCBS BY 8082	0.81	0.31	ND	ND	ND	0.44	0.81	4.4	0.85	1.08	0.2	1	0.2

Sample ID	FB-11	FB-12	FB-13	FDUP-01	FS-01-TT	FS-02-TT	FS-03-TT	FS-04-TT	FS-05-TT	FS-06-TT	NJ Residential Direct Contact Soil Remediation Standard (mg/kg)	NJ Non- Residential Direct Contact Soil Remediation Standard (mg/kg)	NJ Default Impact to Ground Water Soil Screening Level (mg/kg)
Date Samples	6/13/06	6/13/06	6/13/06	6/13/06	6/13/06	6/13/06	6/13/06	6/13/06	6/13/06	6/13/06			
Matrix	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil			
Sample Depth (ft)	0.5-1	0.5-1	0.5-1	0.5-1	0-0.5	0-0.5	0-0.5	0-0.5	0-0.5	0-0.5			
Units	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg			
PCBS BY 8082	1.66	0.97	0.28	0.6	0.65	0.11	ND	0.46	0.79	2.73	0.2	1	0.2

Sample ID	FS-13-TT	FB-14-TT	FB-15-TT	FB-16-TT	FB-17-TT	FB-18-TT	FB-19-TT	FS-20-TT	FB-22-TT	FB-23-TT	NJ Residential Direct Contact Soil Remediation Standard (mg/kg)	NJ Non- Residential Direct Contact Soil Remediation Standard (mg/kg)	NJ Default Impact to Ground Water Soil Screening Level (mg/kg)
Date Samples	6/13/06	6/21/06	6/21/06	6/21/06	6/21/06	6/21/06	6/21/06	6/21/06	6/21/06	6/21/06			
Matrix	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil			
Sample Depth (ft)	0-0.5	1.5-2	1.5-2	1.5-2	1.5-2	1.5-2	1.5-2	1.5-2	1.5-2	1.5-2			
Units	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg			
PCBS BY 8082	ND	0.35	1.4	ND	0.6	ND	ND	0.13	0.9	1.2	0.2	1	0.2

NOTES:

ND= Not Detected

Yellow highlight and bold indicates exceedance of the NJ DIGWSSL and NJDEP Residential SRS

Gray highlight and bold indicates exceedance of the NJDEP Non-Residential SRS

Blue highlight and bold indicates that the value can be rounded down to the SRS or DIGWSSL

TABLE 1
PAGE 2 OF 7

HISTORICAL SOIL ANALYTICAL PCB DATA SUMMARY TABLE
JUNE-JULY 2006

FULTON COMMERCIAL @ 330 COMMERCIAL AVENUE
330 COMMERCIAL AVENUE
NEW BRUNSWICK, NEW JERSEY 08901
NJDEP PI No. 244730

Sample ID	FB-24-TT	FB-25-TT	FB-26-TT	FB-21-TT	FS-07-TT	FS-08-TT	FS-09-TT	FS-10-TT	FS-11-TT	FS-12-TT	NJ Residential Direct	NJ Non-Residential Direct	NJ Default Impact to Ground Water Soil Screeninig Level (mg/kg)
Date Samples	6/21/06	6/21/06	6/21/06	6/22/06	6/22/06	6/22/06	6/22/06	6/22/06	6/22/06	6/22/06	Contact Soil Remediation Standard (mg/kg)	Contact Soil Remediation Standard (mg/kg)	
Matrix	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil			
Sample Depth (ft)	1.5-2	1.5-2	1.5-2	1.5-2	0-0.5	0-0.5	0-0.5	0-0.5	0-0.5	0-0.5			
Units	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg			
PCBS BY 8082	1	0.57	ND	1.29	2.7	3.9	5.1	1.35	2.05	1.57	0.2	1	0.2

Sample ID	FS-14-TT	FS-15-TT	FS-16-TT	FS-17-TT	FS-18-TT	FB-32-TT	FB-33-TT	FB-34-TT	FB-35-TT	FB-36-TT	NJ Residential Direct	NJ Non-Residential Direct	NJ Default Impact to Ground Water Soil Screeninig Level (mg/kg)
Date Samples	6/22/06	6/22/06	6/22/06	6/22/06	6/22/06	6/28/06	6/28/06	6/28/06	6/28/06	6/28/06	Contact Soil Remediation Standard (mg/kg)	Contact Soil Remediation Standard (mg/kg)	
Matrix	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil			
Sample Depth (ft)	0-0.5	0-0.5	0-0.5	0-0.5	0-0.5	0.5-1	0.5-1	0.5-1	0.5-1	0.5-1			
Units	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg			
PCBS BY 8082	1.82	4.2	6.9	1.58	1.28	0.47	6.7	0.1	1.38	ND	0.2	1	0.2

Sample ID	FB-37-TT	FB-38-TT	FB-39-TT	FS-29-TT	FS-30-TT	FS-31-TT	FS-32-TT	FS-33-TT	FS-34-TT	FSIM-01-TT	NJ Residential Direct	NJ Non-Residential Direct	NJ Default Impact to Ground Water Soil Screeninig Level (mg/kg)
Date Samples	6/28/06	6/28/06	6/28/06	6/28/06	6/28/06	6/28/06	6/28/06	6/28/06	6/28/06	6/28/06	Contact Soil Remediation Standard (mg/kg)	Contact Soil Remediation Standard (mg/kg)	
Matrix	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil			
Sample Depth (ft)	0.5-1	0.5-1	0.5-1	0-0.5	0-0.5	0-0.5	0-0.5	0-0.5	0-0.5	0-0.5			
Units	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg			
PCBS BY 8082	ND	0.58	0.68	2.7	0.18	5.5	ND	0.34	0.12	2.21	0.2	1	0.2

NOTES:

ND= Not Detected

Yellow highlight and bold indicates exceedance of the NJ DIGWSSL and NJDEP Residential SRS

Gray highlight and bold indicates exceedance of the NJDEP Non-Residential SRS

Blue highlight and bold indicates that the value can be rounded down to the SRS or DIGWSSL

TABLE 1
PAGE 3 OF 7

HISTORICAL SOIL ANALYTICAL PCB DATA SUMMARY TABLE
JUNE-JULY 2006

FULTON COMMERCIAL @ 330 COMMERCIAL AVENUE
330 COMMERCIAL AVENUE
NEW BRUNSWICK, NEW JERSEY 08901
NJDEP PI No. 244730

Sample ID	FSIM-02-TT	FCTBSN-01-TT	FSIM-03-TT	FSIM-04-TT	FSIM-05-TT	FSIM-06-TT	FSIM-07-TT	FSIM-08-TT	FSIM-09-TT	FSIM-10-TT	NJ Residential Direct Contact Soil Remediation Standard (mg/kg)	NJ Non-Residential Direct Contact Soil Remediation Standard (mg/kg)	NJ Default Impact to Ground Water Soil Screening Level (mg/kg)
Date Samples	6/28/06	6/29/06	6/29/06	6/29/06	6/29/06	6/29/06	6/29/06	6/29/06	6/29/06	6/29/06			
Matrix	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil			
Sample Depth (ft)	0-0.5	0-0.5	0-0.5	0-0.5	0-0.5	0-0.5	0-0.5	0-0.5	0-0.5	0-0.5			
Units	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg			
PCBS BY 8082	0.12	ND	3	1.14	0.85	6.9	0.13	0.43	0.3	0.39	0.2	1	0.2

Sample ID	FSIM-11-TT	FSIM-12-TT	FSIM-13-TT	FSIM-14-TT	FSIM-15-TT	FSIM-16-TT	FSIM-17-TT	FSIM-18-TT	FB40-TT	FB41-TT	NJ Residential Direct Contact Soil Remediation Standard (mg/kg)	NJ Non-Residential Direct Contact Soil Remediation Standard (mg/kg)	NJ Default Impact to Ground Water Soil Screening Level (mg/kg)
Date Samples	6/29/06	6/29/06	6/29/06	6/29/06	6/29/06	6/29/06	6/29/06	6/29/06	7/7/06	7/7/06			
Matrix	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil			
Sample Depth (ft)	0-0.5	0-0.5	0-0.5	0-0.5	0-0.5	0-0.5	0-0.5	0-0.5	0.5-1	0.5-1			
Units	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg			
PCBS BY 8082	0.18	0.13	0.33	0.11	0.27	0.77	0.57	0.36	0.35	0.27	0.2	1	0.2

Sample ID	FB42-TT	FDUP01-TT	FS35-TT	FS36-TT	FS37-TT	FB45-TT	FB46-TT	FB47-TT	FB48-TT	FB49-TT	NJ Residential Direct Contact Soil Remediation Standard (mg/kg)	NJ Non-Residential Direct Contact Soil Remediation Standard (mg/kg)	NJ Default Impact to Ground Water Soil Screening Level (mg/kg)
Date Samples	7/7/06	7/7/06	7/7/06	7/7/06	7/7/06	7/11/06	7/11/06	7/11/06	7/11/06	7/11/06			
Matrix	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil			
Sample Depth (ft)	0.5-1	0.5-1	0-0.5	0-0.5	0-0.5	0.5-1	0.5-1	0.5-1	0.5-1	0.5-1			
Units	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg			
PCBS BY 8082	0.11	0.37	0.21	0.11	0.099	3.9	0.25	ND	0.18	ND	0.2	1	0.2

NOTES:

ND= Not Detected

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Gray highlight and bold indicates exceedance of the NJDEP Non-Residential SRS

Blue highlight and bold indicates that the value can be rounded down to the SRS or DIGWSSL

TABLE 1
PAGE 4 OF 7

HISTORICAL SOIL ANALYTICAL PCB DATA SUMMARY TABLE
JUNE-JULY 2006

FULTON COMMERCIAL @ 330 COMMERCIAL AVENUE
330 COMMERCIAL AVENUE
NEW BRUNSWICK, NEW JERSEY 08901
NJDEP PI No. 244730

Sample ID	FB50-TT	FB51-TT	FB52-TT	FB53-TT	FB54-TT	FB55-TT	FB56-TT	FB57-TT	FB58-TT	FB59-TT	NJ Residential Direct Contact Soil Remediation Standard (mg/kg)	NJ Non-Residential Direct Contact Soil Remediation Standard (mg/kg)	NJ Default Impact to Ground Water Soil Screening Level (mg/kg)
Date Samples	7/11/06	7/11/06	7/11/06	7/11/06	7/11/06	7/11/06	7/11/06	7/11/06	7/11/06	7/11/06			
Matrix	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil			
Sample Depth (ft)	0.5-1	0.5-1	0.5-1	0.5-1	0.5-1	0.5-1	0.5-1	0.5-1	0.5-1	0.5-1			
Units	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg			
PCBS BY 8082	ND	ND	0.22	0.26	1.08	ND	ND	0.09	ND	0.32	0.2	1	0.2

Sample ID	FB60-TT	FB61-TT	FB62-TT	FB63-TT	FB65-TT	FB66-TT	FS40-TT	FS41-TT	FS42-TT	FS43-TT	NJ Residential Direct Contact Soil Remediation Standard (mg/kg)	NJ Non-Residential Direct Contact Soil Remediation Standard (mg/kg)	NJ Default Impact to Ground Water Soil Screening Level (mg/kg)
Date Samples	7/11/06	7/11/06	7/11/06	7/11/06	7/11/06	7/11/06	7/11/06	7/11/06	7/11/06	7/11/06			
Matrix	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil			
Sample Depth (ft)	0.5-1	0.5-1	0.5-1	0.5-1	0.5-1	0.5-1	0-0.5	0-0.5	0-0.5	0-0.5			
Units	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg			
PCBS BY 8082	0.099	0.68	ND	0.52	0.66	0.16	4.4	1.65	1.42	2	0.2	1	0.2

Sample ID	FS44-TT	FS45-TT	FS46-TT	FS47-TT	FS48-TT	FS49-TT	FS50-TT	FS51-TT	FS52-TT	FS54-TT	NJ Residential Direct Contact Soil Remediation Standard (mg/kg)	NJ Non-Residential Direct Contact Soil Remediation Standard (mg/kg)	NJ Default Impact to Ground Water Soil Screening Level (mg/kg)
Date Samples	7/11/06	7/11/06	7/11/06	7/11/06	7/11/06	7/11/06	7/11/06	7/11/06	7/11/06	7/11/06			
Matrix	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil			
Sample Depth (ft)	0-0.5	0-0.5	0-0.5	0-0.5	0-0.5	0-0.5	0-0.5	0-0.5	0-0.5	0-0.5			
Units	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg			
PCBS BY 8082	ND	0.48	0.33	0.5	0.33	0.59	0.13	1.02	2.37	ND	0.2	1	0.2

NOTES:

ND= Not Detected

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TABLE 1
PAGE 5 OF 7

HISTORICAL SOIL ANALYTICAL PCB DATA SUMMARY TABLE
JUNE-JULY 2006

FULTON COMMERCIAL @ 330 COMMERCIAL AVENUE
330 COMMERCIAL AVENUE
NEW BRUNSWICK, NEW JERSEY 08901
NJDEP PI No. 244730

Sample ID	FB70-TT	FB71-TT	FB72-TT	FB73-TT	FB74-TT	FS53-TT	FS55-TT	FS56-TT	FS60-TT	FS61-TT	NJ Residential Direct Contact Soil Remediation Standard (mg/kg)	NJ Non-Residential Direct Contact Soil Remediation Standard (mg/kg)	NJ Default Impact to Ground Water Soil Screening Level (mg/kg)
Date Samples	7/12/06	7/12/06	7/12/06	7/12/06	7/12/06	7/12/06	7/12/06	7/12/06	7/13/06	7/13/06			
Matrix	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil			
Sample Depth (ft)	0.5-1	0.5-1	0.5-1	0.5-1	0.5-1	0-0.5	0-0.5	0-0.5	0-0.5	0-0.5			
Units	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg			
PCBS BY 8082	2	ND	ND	ND	ND	ND	ND	0.26	0.34	20.2	0.2	1	0.2

Sample ID	FS62-TT	FS63-TT	FS64-TT	FS65-TT	FS66-TT	FS67-TT	FB75-TT	FB76-TT	FB77-TT	FB78-TT	NJ Residential Direct Contact Soil Remediation Standard (mg/kg)	NJ Non-Residential Direct Contact Soil Remediation Standard (mg/kg)	NJ Default Impact to Ground Water Soil Screening Level (mg/kg)
Date Samples	7/13/06	7/13/06	7/13/06	7/13/06	7/13/06	7/13/06	7/17/06	7/17/06	7/17/06	7/17/06			
Matrix	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil			
Sample Depth (ft)	0-0.5	0-0.5	0-0.5	0-0.5	0-0.5	0-0.5	0.5-1	0.5-1	0.5-1	0.5-1			
Units	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg			
PCBS BY 8082	20	9.1	51	70	76	33	23	13	ND	0.3	0.2	1	0.2

Sample ID	FB79-TT	FB80-TT	FB81-TT	FB82-TT	FB83-TT	FB84-TT	FB85-TT	FB86-TT	FB87-TT	FB88-TT	NJ Residential Direct Contact Soil Remediation Standard (mg/kg)	NJ Non-Residential Direct Contact Soil Remediation Standard (mg/kg)	NJ Default Impact to Ground Water Soil Screening Level (mg/kg)
Date Samples	7/17/06	7/17/06	7/17/06	7/17/06	7/17/06	7/17/06	7/17/06	7/17/06	7/17/06	7/18/06			
Matrix	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil			
Sample Depth (ft)	0.5-1	0.5-1	0.5-1	0.5-1	0.5-1	0.5-1	0.5-1	0.5-1	0.5-1	0.5-1			
Units	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg			
PCBS BY 8082	0.21	0.18	ND	ND	0.21	0.16	0.21	0.79	ND	0.21	0.2	1	0.2

NOTES:

ND= Not Detected

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Blue highlight and bold indicates that the value can be rounded down to the SRS or DIGWSSL

TABLE 1
PAGE 6 OF 7

HISTORICAL SOIL ANALYTICAL PCB DATA SUMMARY TABLE
JUNE-JULY 2006

FULTON COMMERCIAL @ 330 COMMERCIAL AVENUE
330 COMMERCIAL AVENUE
NEW BRUNSWICK, NEW JERSEY 08901
NJDEP PI No. 244730

Sample ID	FB89-TT	FB90-TT	FB91-TT	FB92-TT	FB93-TT	FB94-TT	FB95-TT	FB96-TT	FS68-TT	FS69-TT	NJ Residential Direct Contact Soil Remediation Standard (mg/kg)	NJ Non- Residential Direct Contact Soil Remediation Standard (mg/kg)	NJ Default Impact to Ground Water Soil Screening Level (mg/kg)
Date Samples	7/18/06	7/18/06	7/18/06	7/18/06	7/18/06	7/18/06	7/18/06	7/18/06	7/18/06	7/18/06			
Matrix	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil			
Sample Depth (ft)	0.5-1	0.5-1	0.5-1	0.5-1	0.5-1	0.5-1	0.5-1	0.5-1	0-0.5	0-0.5			
Units	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg			
PCBS BY 8082	0.36	0.43	1.9	2.6	1.11	1.07	2.1	2.02	1.25	1.03	0.2	1	0.2

Sample ID	FS70-TT	FS71-TT	FS72-TT	FS73-TT	FB97-TT	FB98-TT	FS74-TT	FS75-TT	FS76-TT	FS77-TT	NJ Residential Direct Contact Soil Remediation Standard (mg/kg)	NJ Non- Residential Direct Contact Soil Remediation Standard (mg/kg)	NJ Default Impact to Ground Water Soil Screening Level (mg/kg)
Date Samples	7/18/06	7/18/06	7/18/06	7/18/06	7/19/06	7/19/06	7/19/06	7/19/06	7/19/06	7/19/06			
Matrix	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil			
Sample Depth (ft)	0-0.5	0-0.5	0-0.5	0-0.5	0.5-1	0.5-1	0-0.5	0-0.5	0-0.5	0-0.5			
Units	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg			
PCBS BY 8082	1.03	200	1.63	0.59	0.97	0.91	0.35	ND	1.08	0.32	0.2	1	0.2

Sample ID	FS78-TT	FS79-TT	FS57-TT	FS58-TT	FS59-TT	FS80-TT	FS81-TT	FS82-TT	FS83-TT	FS84-TT	NJ Residential Direct Contact Soil Remediation Standard (mg/kg)	NJ Non- Residential Direct Contact Soil Remediation Standard (mg/kg)	NJ Default Impact to Ground Water Soil Screening Level (mg/kg)
Date Samples	7/19/06	7/19/06	7/20/06	7/20/06	7/20/06	7/20/06	7/20/06	7/20/06	7/20/06	7/20/06			
Matrix	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil			
Sample Depth (ft)	0-0.5	0-0.5	0-0.5	0-0.5	0-0.5	0-0.5	0-0.5	0-0.5	0-0.5	0-0.5			
Units	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg			
PCBS BY 8082	0.48	0.11	ND	0.29	0.12	0.098	ND	0.13	1.84	1.19	0.2	1	0.2

NOTES:

ND= Not Detected

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TABLE 1
PAGE 7 OF 7

HISTORICAL SOIL ANALYTICAL PCB DATA SUMMARY TABLE
JUNE-JULY 2006

FULTON COMMERCIAL @ 330 COMMERCIAL AVENUE
330 COMMERCIAL AVENUE
NEW BRUNSWICK, NEW JERSEY 08901
NJDEP PI No. 244730

Sample ID	FS85-TT	FS86-TT	FS87-TT	FS88-TT	FS89-TT	FS90-TT	FS91-TT	FS92-TT	FS93-TT	FS94-TT	NJ Residential Direct Contact Soil Remediation Standard (mg/kg)	NJ Non- Residential Direct Contact Soil Remediation Standard (mg/kg)	NJ Default Impact to Ground Water Soil Screening Level (mg/kg)
Date Samples	7/20/06	7/20/06	7/20/06	7/20/06	7/20/06	7/20/06	7/20/06	7/20/06	7/20/06	7/20/06			
Matrix	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil			
Sample Depth (ft)	0-0.5	0-0.5	0-0.5	0-0.5	0-0.5	0-0.5	0-0.5	0-0.5	0-0.5	0-0.5			
Units	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg			
PCBS BY 8082	0.13	0.62	ND	1.01	0.37	0.54	1.52	ND	ND	ND	0.2	1	0.2

Sample ID	FB100-TT	FB101-TT	FB102-TT	FB103-TT	FB104-TT	FB105-TT	FB99-TT	FS95-TT	FS96-TT	FS97-TT	NJ Residential Direct Contact Soil Remediation Standard (mg/kg)	NJ Non- Residential Direct Contact Soil Remediation Standard (mg/kg)	NJ Default Impact to Ground Water Soil Screening Level (mg/kg)
Date Samples	7/21/06	7/21/06	7/21/06	7/21/06	7/21/06	7/21/06	7/21/06	7/21/06	7/21/06	7/21/06			
Matrix	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil			
Sample Depth (ft)	0.5-1	0.5-1	0.5-1	0.5-1	0.5-1	0.5-1	0.5-1	0-0.5	0-0.5	0-0.5			
Units	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg			
PCBS BY 8082	0.29	0.95	1.52	1.45	1.77	1.24	0.16	20.2	ND	0.1	0.2	1	0.2

NOTES:

ND= Not Detected

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TABLE 2
PAGE 1 OF 3

SOIL ANALYTICAL PCB DATA SUMMARY TABLE
AOC-E1 - FLOODED AREA

FULTON COMMERCIAL @ 330 COMMERCIAL AVENUE
330 COMMERCIAL AVENUE
NEW BRUNSWICK, NEW JERSEY 08901
NJDEP PI No. 244730

Sample ID	FA-1	FA-2	Residential Direct Contact Soil Remediation Standard (mg/kg)	Non-Residential Direct Contact Soil Remediation Standard (mg/kg)	Default Impact to Groundwater Soil Screening Level (mg/kg)
Date Sampled	5/8/09	5/8/09			
Matrix	Soil	Soil			
Sample Depth (feet)	0.0-0.5	0.0-0.5			
Units	mg/kg	mg/kg			
PCBs	0.186	0.245	0.2	1	0.2

NOTES:

ND = Compound not detected.

Analytical results highlighted in blue do not exceed the SRS or DIGWSSL if rounded down.

TABLE 2
PAGE 2 OF 3

SOIL ANALYTICAL PCB DATA SUMMARY TABLE
AOC-G1 - COAL BIN

FULTON COMMERCIAL @ 330 COMMERCIAL AVENUE
330 COMMERCIAL AVENUE
NEW BRUNSWICK, NEW JERSEY 08901
NJDEP PI No. 244730

Sample ID	SWS-4	SWS-10-1	Residential Direct Contact Soil Remediation Standard (mg/kg)	Non-Residential Direct Contact Soil Remediation Standard (mg/kg)	Default Impact to Groundwater Soil Screening Level (mg/kg)
Date Sampled	4/30/09	7/17/13			
Matrix	Soil	Soil			
Sample Depth (feet)	3.5-4.0	3.0-3.5			
Units	mg/kg	mg/kg			
PCBs					
PCBs (total)	ND	ND	0.2	1	0.2

NOTES:

ND = Compound not detected.

Analytical results highlighted in blue do not exceed the SRS or DIGWSSL if rounded down.

TABLE 2
PAGE 3 OF 3

SOIL ANALYTICAL PCB DATA SUMMARY TABLE
AOC-G2 - SITE WIDE SOILS

FULTON COMMERCIAL @ 330 COMMERCIAL AVENUE
330 COMMERCIAL AVENUE
NEW BRUNSWICK, NEW JERSEY 08901
NJDEP PI No. 244730

Sample ID	SWS-1	SWS-2	SWS-3	SWS-5	SWS-6	SWS-7	SWS-8	SWS-9	Residential Direct Contact Soil Remediation Standard (mg/kg)	Non-Residential Direct Contact Soil Remediation Standard (mg/kg)	Default Impact to Groundwater Soil Screening Level (mg/kg)
Date Sampled	4/30/09	4/30/09	4/30/09	4/30/09	4/30/09	4/30/09	4/30/09	4/30/09			
Matrix	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil			
Sample Depth (feet)	7.0-7.5	5.5-6.0	5.5-6.0	6.0-6.5	4.0-4.5	6.0-6.5	3.0-3.5	3.0-3.5			
Units	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg			
PCBs											
PCBs (total)	ND	ND	ND	ND	ND	ND	ND	ND	0.2	1	0.2

NOTES:

ND = Compound not detected.

Analytical results highlighted in blue do not exceed the SRS or DIGWSSL if rounded down.

Analytical results in bold and shaded gray are above the NJDEP Soil Cleanup Standard or Default Impact to Groundwater Soil Screening Level.

TABLE 3

PCB ANALYTICAL DATA SUMMARY TABLE FOR GROUNDWATER

**FULTON COMMERCIAL
330 COMMERCIAL AVENUE
NEW BRUNSWICK, NEW JERSEY 08901**

Sample ID	MW-1	MW-1	New Jersey Groundwater Quality Standards (N.J.A.C. 7:9) ug/l
Date Sampled	4/24/13	7/25/13	
Matrix	Groundwater	Groundwater	
Units	µg/l	µg/l	
Parameter: PCB	ND	ND	0.5

Sample ID	MW-2	MW-2	New Jersey Groundwater Quality Standards (N.J.A.C. 7:9) ug/l
Date Sampled	4/24/13	7/25/13	
Matrix	Groundwater	Groundwater	
Units	µg/l	µg/l	
Parameter: PCB	ND	ND	0.5

Sample ID	MW-3	MW-3	New Jersey Groundwater Quality Standards (N.J.A.C. 7:9) ug/l
Date Sampled	4/24/13	7/25/13	
Matrix	Groundwater	Groundwater	
Units	µg/l	µg/l	
Parameter: PCB	ND	ND	0.5

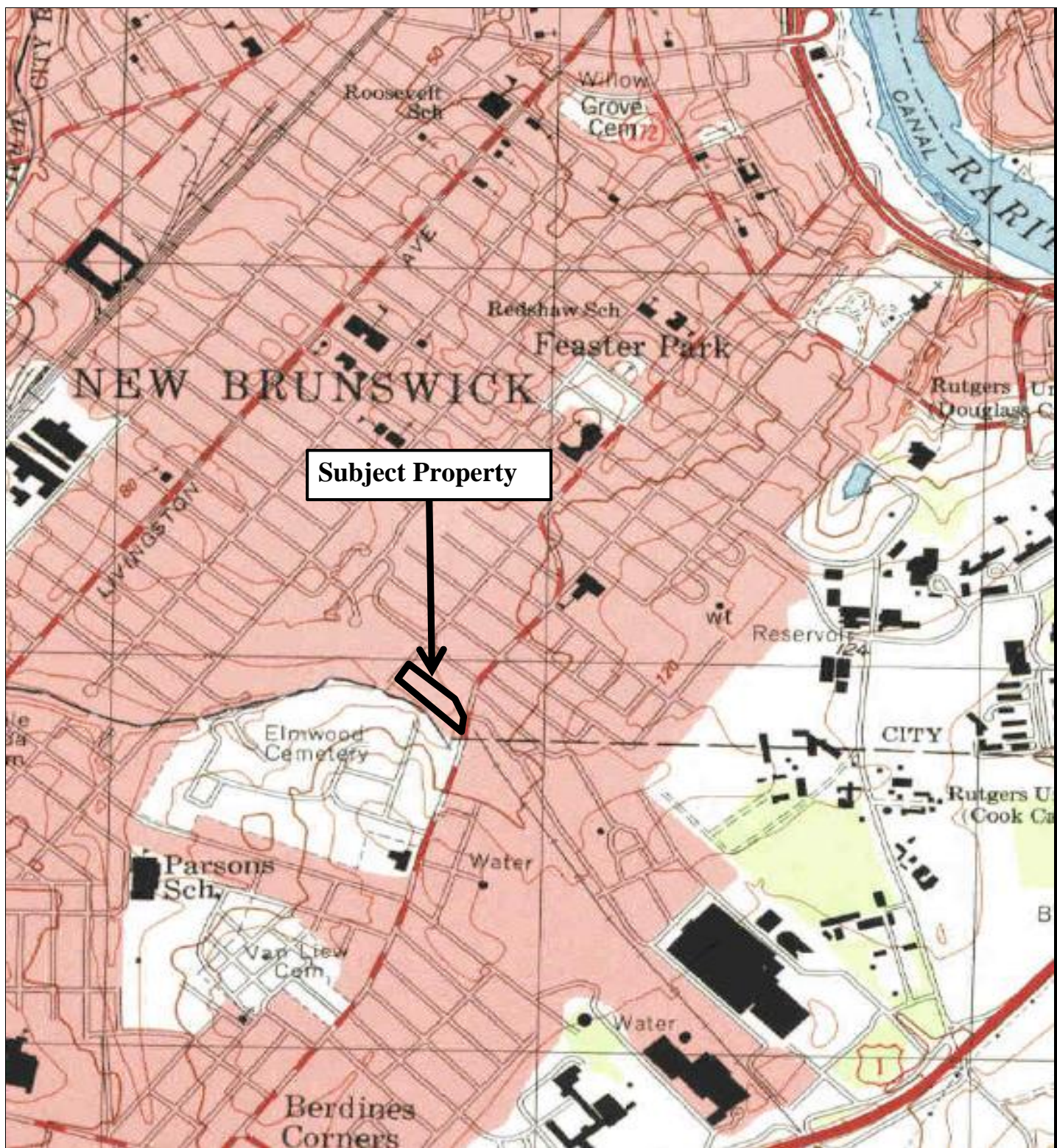
Sample ID	MW-4	MW-4	NJ Groundwater Quality Standards (N.J.A.C. 7:9) ug/l
Date Sampled	4/24/13	7/25/13	
Matrix	Groundwater	Groundwater	
Units	µg/l	µg/l	
Parameter: PCB	ND	ND	0.5

NOTES:

ND = Compound not detected.

Analytical results in bold are above the NJ Groundwater Quality Standards (N.J.A.C. 7:9).

FIGURES



Source: 1995 USGS Topographic Map New Brunswick Quadrant

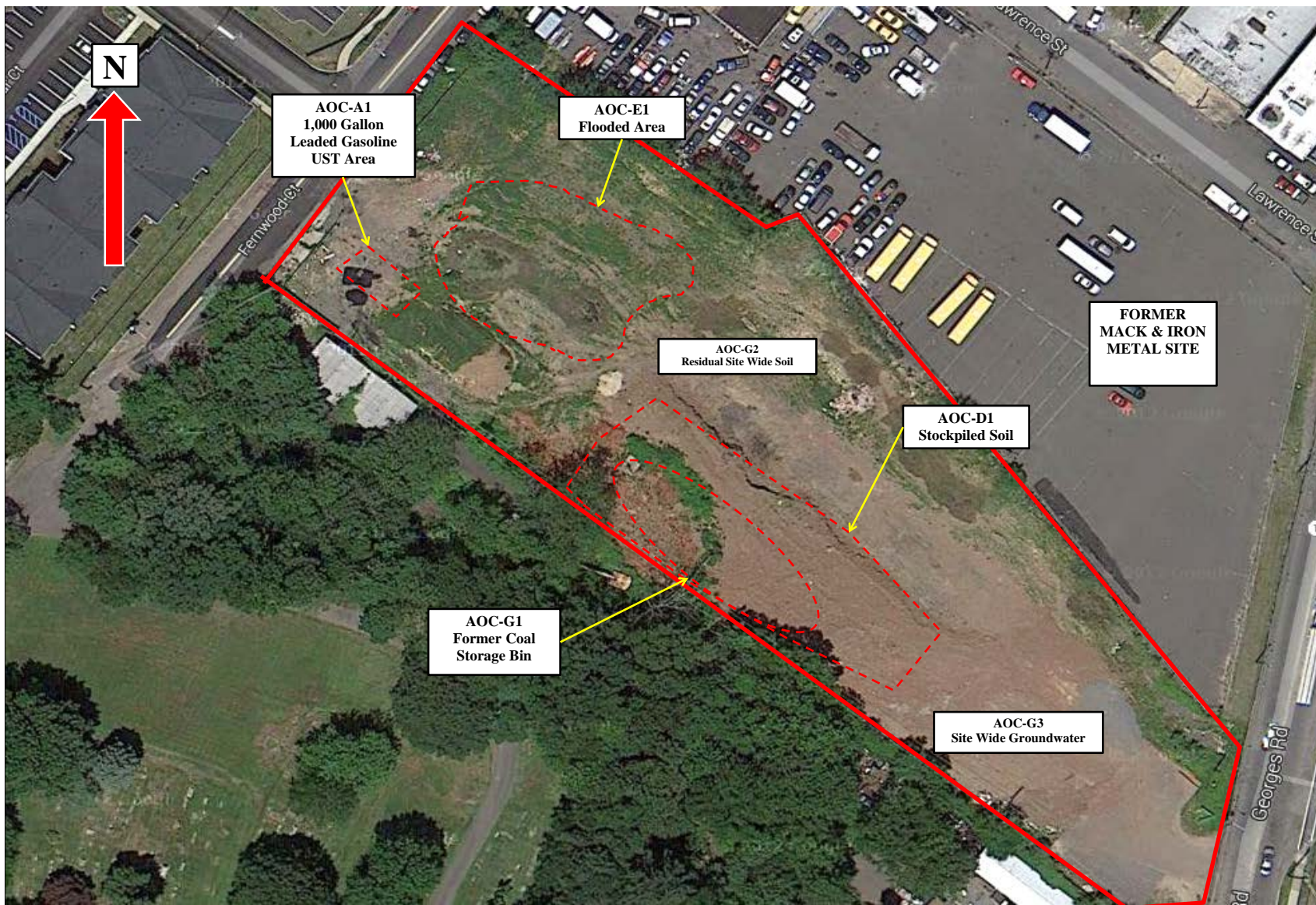


RTP Environmental Associates, Inc
239 US Highway 22 East
Green Brook, New Jersey 08812

Figure 1
Site Location Map
330 Commercial Avenue
New Brunswick, NJ 08901

Scale: 1" = 1,200'

August 20, 2013



Legend

— = Site Boundary

- - - = AOC Boundary



RTP Environmental Associates, Inc
239 US Highway 22 East
Green Brook, New Jersey 08812

Figure 2
Site Plan and AOC Locations
Fulton Commercial
330 Commercial Avenue
New Brunswick, New Jersey 08901

Scale: 1" = 85'

August 20, 2013



LEGEND

- SOIL SAMPLE LOCATIONS WITH PCB RESULTS ABOVE 10 mg/kg
- SOIL SAMPLE LOCATIONS WITH PCB RESULTS BELOW 10 mg/kg

FS-20 INDICATES POST EXCAVATION
SIDEWALL SAMPLE

FB-27 INDICATES POST EXCAVATION
BOTTOM SAMPLE

[- -] PROPERTY BOUNDARY



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Green Brook, New Jersey 08812

FIGURE
3

HISTORIC PCBs POST EXCAVATION
SOIL SAMPLE LOCATION MAP

FULTON COMMERCIAL
330 COMMERCIAL AVE
NEW BRUNSWICK NJ

SCALE IN FT.
0 30 60

DRAWN BY:
EK

DATE:
02/09/2018



Legend

- = Soil Sample Location
- = Site Boundary



RTP Environmental Associates, Inc
239 US Highway 22 East
Green Brook, New Jersey 08812

Figure 4
RTP PCB Soil Sample Location Map
330 Commercial Avenue
New Brunswick, New Jersey 08901

Scale: 1" = 85'

August 20, 2013



Legend

⊗ = Monitoring Well Location

MW-2 = Monitoring Designation



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Green Brook, New Jersey 08812

Figure 5
Monitoring Well Location Map
Fulton Commercial 3
30 Commercial Avenue
New Brunswick, New Jersey
Date: 9-4-2017



Legend

= Property Boundary



RTP Environmental Associates, Inc.
239 US Highway 22 East
Green Brook, New Jersey 08812

Figure 6
Conceptual Site Model
with Proposed Development
Fulton Commercial 330 Commercial
Avenue New Brunswick, New Jersey
Date: 9-4-2017



LEGEND

- SOIL SAMPLE LOCATIONS WITH PCB RESULTS ABOVE 10 mg/kg
- SOIL SAMPLE LOCATIONS WITH PCB RESULTS BELOW 10 mg/kg
- FS-20 INDICATES POST EXCAVATION SIDEWALL SAMPLE
- FB-27 INDICATES POST EXCAVATION BOTTOM SAMPLE
- [---] PROPERTY BOUNDARY
- [---] PROPOSED SOIL EXCAVATION



RTP ENVIRONMENTAL ASSOCIATES, INC.
239 US Highway 22 East
Green Brook, New Jersey 08812

FIGURE 7

PROPOSED PCB EXCAVATION AREA MAP
FULTON COMMERCIAL
330 COMMERCIAL AVE
NEW BRUNSWICK NJ

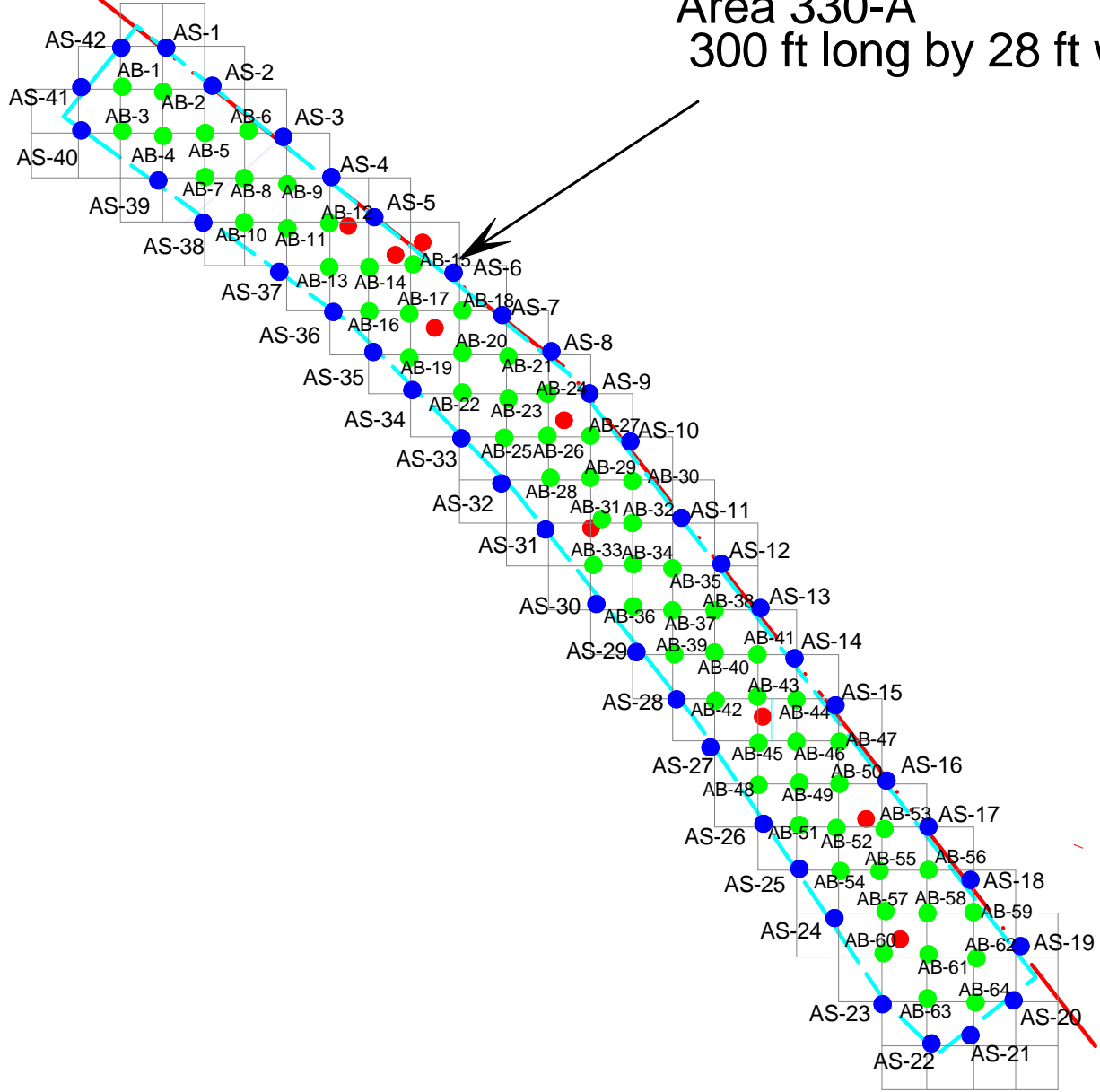
SCALE IN FT.
0 30 60

DRAWN BY:
EK

DATE:
02/09/2018



PROPOSED EXCAVATION Area 330-A 300 ft long by 28 ft wide



LEGEND

- HISTORICAL SOIL SAMPLE LOCATIONS WITH PCB RESULTS ABOVE 10 mg/kg
- PROPOSED POST-EXCAVATION SOIL SAMPLE LOCATIONS (BASE EXCAVATION SOIL SAMPLE)
- PROPOSED POST-EXCAVATION SOIL SAMPLE LOCATIONS (SIDEWALL EXCAVATION SOIL SAMPLE)

AS-1 AREA A EXCAVATION SIDEWALL SAMPLE (0-0.5 FT.BGS)
AB-1 AREA A EXCAVATION BASE SAMPLE (1-1.5 FT. BGS)

- - - PROPERTY BOUNDARY
- - - PROPOSED SOIL EXCAVATION



RTP ENVIRONMENTAL
ASSOCIATES, INC.
239 US Highway 22 East
Green Brook, New Jersey 08812

FIGURE
8

PROPOSED POST EXCAVATION
SOIL SAMPLE LOCATION MAP
AREA 330-A
FULTON COMMERCIAL
330 COMMERCIAL AVE
NEW BRUNSWICK NJ

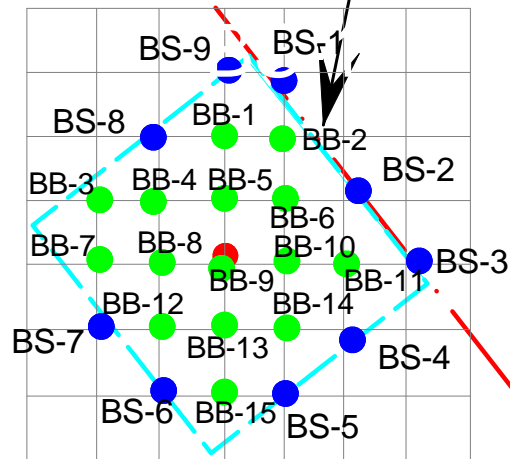
SCALE IN FT.

0 20 40

DRAWN BY: EK	DATE: 05/30/2018
-----------------	---------------------



PROPOSED EXCAVATION
Area 330-B
45 ft long by 44 ft wide by 1 ft. deep



LEGEND

- HISTORICAL SOIL SAMPLE LOCATIONS WITH PCB RESULTS ABOVE 10 mg/kg
- PROPOSED POST-EXCAVATION SOIL SAMPLE LOCATIONS (BASE EXCAVATION SOIL SAMPLE)
- PROPOSED POST-EXCAVATION SOIL SAMPLE LOCATIONS (SIDEWALL EXCAVATION SOIL SAMPLE)

BS-1 AREA A EXCAVATION SIDEWALL SAMPLE (0-0.5 FT. BGS)
BB-1 AREA A EXCAVATION BASE SAMPLE (1-1.5 FT. BGS)

- PROPERTY BOUNDARY
- PROPOSED SOIL EXCAVATION



RTP ENVIRONMENTAL
ASSOCIATES, INC.
239 US Highway 22 East
Green Brook, New Jersey 08812

FIGURE
9

PROPOSED POST EXCAVATION
SOIL SAMPLE LOCATION MAP

FULTON COMMERCIAL
330 COMMERCIAL AVE
NEW BRUNSWICK NJ

SCALE IN FT.
0 15 30

DRAWN BY:
EK

DATE:
05/31/2018



Legend

- Property Boundary
- Vegetation Cap = 10 inches of clay followed by 6 inches of top soil and mulch/seed.
- Asphalt Cap = certified clean soil and/or 6 inches of asphalt and subbase material.
- Concrete Cap = certified clean fill and/or 6 inches of concrete/concrete slab.



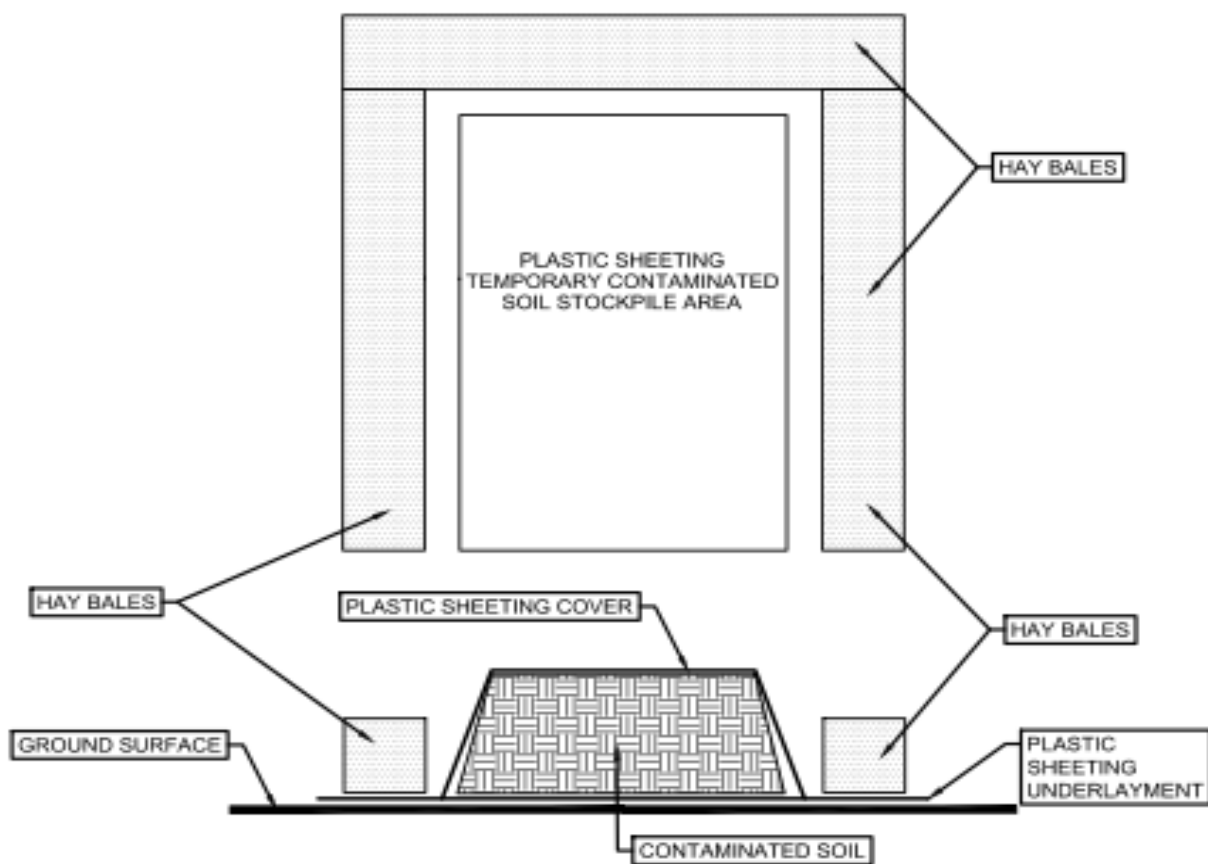
RTP Environmental Associates, Inc.
239 US Highway 22 East
Green Brook, New Jersey 08812

Figure 10
Capping Detail
Fulton Commercial
330 Commercial Avenue
New Brunswick, New Jersey
Date: 5-31-2018

APPENDIX I
SITE INVESTIGATION / REMEDIAL INVESTIGATION REPORT
(CD ONLY)

APPENDIX II

PCB CONTAMINATED SOIL STOCKPILE DETAIL



CONTAMINATED SOIL STOCKPILE DETAIL

NTS

NOTE:

1. CONTAMINATED SOIL STOCKPILE SHALL BE COVERED WITH PLASTIC SHEETING ON A DAILY BASIS UNTIL IT IS REMOVED FOR OFFSITE DISPOSAL. PLASTIC SHEETING SHALL BE SECURED IN A MANNER SO THAT THE PLASTIC SHEETING DOES NOT EXPOSE THE CONTAMINATED SOIL DUE TO WIND AND OTHER WEATHER FACTORS.



RTP Environmental Associates, Inc
239 US Highway 22 East
Green Brook, New Jersey 08812

Figure CSTPD
PCB Contaminated Soil Stockpile Detail
330 Commercial Avenue LLC
New Brunswick, New Jersey

Scale:

Date: 10-18-18

APPENDIX III
DRAFT DEED NOTICE

Return Address:
330 Commercial Avenue, LLC
1260 Stelton Road
Piscataway, NJ 08854

APPENDIX B - DRAFT DEED NOTICE

DEED NOTICE

IN ACCORDANCE WITH N.J.S.A. 58:10B-13, THIS DOCUMENT IS TO BE RECORDED IN THE SAME MANNER AS ARE DEEDS AND OTHER INTERESTS IN REAL PROPERTY.

Prepared by: _____
[Signature]

John Larkins
RTP Environmental
239 US 22 East, Green Brook, NJ 08812-1909

Recorded by: _____
[Signature, Officer of County Recording Office]

[Print name below signature]

DEED NOTICE

This Deed Notice is made as of the ____ day of ____, ____, by *330 Commercial Avenue, LLC, 1260 Stelton Road, Piscataway, NJ 08854* (together with his/her/its/their successors and assigns, collectively "Owner").

1. THE PROPERTY. *330 Commercial Avenue, LLC, 1260 Stelton Road, Piscataway, NJ 08854* is the owner in fee simple of certain real property designated as Block 292.01 Lot 1.05, on the tax map of the *City of New Brunswick, Middlesex County*; the New Jersey Department of Environmental Protection Program Interest Number (Preferred ID) for the contaminated site which includes this property is 244730; and the property is more particularly described in Exhibit A, which is attached hereto and made a part hereof (the "Property").

2. REMEDIATION.

i. John Larkins, LSRP # 591641 has approved this Deed Notice as an institutional control for the Property, which is part of the remediation of the Property.

ii. N.J.A.C. 7:26C-7 requires the Owner, among other persons, to obtain a soil remedial action permit for the soil remedial action at the Property. That permit will contain the monitoring, maintenance and biennial certification requirements that apply to the Property.

3. SOIL CONTAMINATION. *330 Commercial Avenue, LLC* has remediated contaminated soil at the Property, such that soil contamination remains in certain areas of the Property that contains contaminants in concentrations that do not allow for the unrestricted use of the Property; this soil contamination is described, including the type, concentration and specific location of such contaminants, in Exhibit B, which is attached hereto and made a part hereof. As a result, there is a statutory requirement for this Deed Notice and engineering controls in accordance with N.J.S.A. 58:10B-13.

4. CONSIDERATION. In accordance with the remedial action for the site which included the Property, and in consideration of the terms and conditions of that remedial action, and other good and valuable consideration, Owner has agreed to subject the Property to certain statutory and regulatory requirements that impose restrictions upon the use of the Property, to restrict certain uses of the Property, and to provide notice to subsequent owners, lessees and operators of the restrictions and the monitoring, maintenance, and biennial certification requirements outlined in this Deed Notice and required by law, as set forth herein.

5A. RESTRICTED AREAS. Due to the presence of contamination remaining at concentrations that do not allow for unrestricted use, the Owner has agreed, as part of the remedial action for the Property, to restrict the use of certain parts of the Property (the "Restricted Areas"); a narrative description of these restrictions is provided in Exhibit C, which is attached hereto and made a part hereof. The Owner has also agreed to maintain a list of these restrictions on site for inspection by governmental officials.

5B. RESTRICTED LAND USES. The following statutory land use restrictions apply to the Restricted Areas:

i. The Brownfield and Contaminated Site Remediation Act, N.J.S.A. 58:10B-12.g(10), prohibits the conversion of a contaminated site, remediated to non-residential soil remediation standards that require the maintenance of engineering or institutional controls, to a child care facility, or public, private, or charter school without the Department's prior written approval, unless a presumptive remedy is implemented; and

ii. The Brownfield and Contaminated Site Remediation Act, N.J.S.A. 58:10B-12.g(12), prohibits the conversion of a landfill, with gas venting systems and or leachate collection systems, to a single family residence or a child care facility without the Department's prior written approval.

5C. ENGINEERING CONTROLS. Due to the presence and concentration of these contaminants, the Owner has also agreed, as part of the remedial action for the Property, to the placement of certain engineering controls on the Property; a narrative description of these engineering controls is provided in Exhibit C.]

6A. CHANGE IN OWNERSHIP AND REZONING.

i. The Owner and the subsequent owners and lessees, shall cause all leases, grants, and other written transfers of an interest in the Restricted Areas to contain a provision expressly

requiring all holders thereof to take the Property subject to the restrictions contained herein and to comply with all, and not to violate any of the conditions of this Deed Notice. Nothing contained in this Paragraph shall be construed as limiting any obligation of any person to provide any notice required by any law, regulation, or order of any governmental authority.

ii. The Owner and the subsequent owners shall provide written notice to the Department of Environmental Protection on a form provided by the Department and available at www.nj.gov/srp/forms within thirty (30) calendar days after the effective date of any conveyance, grant, gift, or other transfer, in whole or in part, of the owner's interest in the Restricted Area.

iii. The Owner and the subsequent owners shall provide written notice to the Department, on a form available from the Department at www.nj.gov/srp/forms, within thirty (30) calendar days after the owner's petition for or filing of any document initiating a rezoning of the Property to residential.

6B. SUCCESSORS AND ASSIGNS. This Deed Notice shall be binding upon Owner and upon Owner's successors and assigns, and subsequent owners, lessees and operators while each is an owner, lessee, or operator of the Property.

7A. ALTERATIONS, IMPROVEMENTS, AND DISTURBANCES.

i. The Owner and all subsequent owners and lessees shall notify any person, including, without limitation, tenants, employees of tenants, and contractors, intending to conduct invasive work or excavate within the Restricted Areas, of the nature and location of contamination in the Restricted Areas, and, of the precautions necessary to minimize potential human exposure to contaminants.

ii. Except as provided in Paragraph 7B, below, no person shall make, or allow to be made, any alteration, improvement, or disturbance in, to, or about the Property which disturbs any engineering control at the Property without first obtaining a soil remedial action permit modification pursuant to N.J.A.C. 7:26C-7. Nothing herein shall constitute a waiver of the obligation of any person to comply with all applicable laws and regulations including, without limitation, the applicable rules of the Occupational Safety and Health Administration.

iii. Notwithstanding subparagraph 7Aii., above, a soil remedial action permit modification is not required for any alteration, improvement, or disturbance provided that the owner, lessee or operator:

(A) Notifies the Department of Environmental Protection of the activity by calling the DEP Hotline, at 1-877-WARN-DEP or 1-877-927-6337, within twenty-four (24) hours after the beginning of each alteration, improvement, or disturbance;

(B) Restores any disturbance of an engineering control to pre-disturbance conditions within sixty (60) calendar days after the initiation of the alteration, improvement or disturbance;

(C) Ensures that all applicable worker health and safety laws and regulations are followed during the alteration, improvement, or disturbance, and during the restoration;

(D) Ensures that human exposure to contamination in excess of the remediation standards does not occur; and

(E) Describes, in the next biennial certification the nature of the alteration, improvement, or disturbance, the dates and duration of the alteration, improvement, or disturbance, the name of key individuals and their affiliations conducting the alteration, improvement, or disturbance, a description of the notice the Owner gave to those persons prior to the disturbance.

7B. EMERGENCIES. In the event of an emergency which presents, or may present, an unacceptable risk to the public health and safety, or to the environment, or immediate environmental concern, see N.J.S.A. 58:10C-2, any person may temporarily breach an engineering control provided that that person complies with each of the following:

i. Immediately notifies the Department of Environmental Protection of the emergency, by calling the DEP Hotline at 1-877-WARNDEP or 1-877-927-6337;

ii. Hires a Licensed Site Remediation Professional (unless the Restricted Areas includes an unregulated heating oil tank) to respond to the emergency;

iii. Limits both the actual disturbance and the time needed for the disturbance to the minimum reasonably necessary to adequately respond to the emergency;

iv. Implements all measures necessary to limit actual or potential, present or future risk of exposure to humans or the environment to the contamination;

v. Notifies the Department of Environmental Protection when the emergency or immediate environmental concern has ended by calling the DEP Hotline at 1-877-WARNDEP or 1-877-927-6337; and

vi. Restores the engineering control to the pre-emergency conditions as soon as possible, and provides notification to the Department of Environmental Protection within sixty (60) calendar days after completion of the restoration of the engineering control, including: (a) the nature and likely cause of the emergency; (b) the potential discharges of or exposures to contaminants, if any, that may have occurred; (c) the measures that have been taken to mitigate the effects of the emergency on human health and the environment; (d) the measures completed or implemented to restore the engineering control; and (e) the changes to the engineering control or site operation and maintenance plan to prevent reoccurrence of such conditions in the future.

8. TERMINATION OF DEED NOTICE.

i. This Deed Notice may be terminated only upon filing of a Termination of Deed Notice, available at N.J.A.C. 7:26C Appendix C, with the office of *the County Clerk/Register of Deeds and Mortgages* of Middlesex County, New Jersey, expressly terminating this Deed Notice.

ii. Within thirty (30) calendar days after the filing of a Termination of Deed Notice, the owner of the property shall apply to the Department for termination of the soil remedial action permit pursuant to N.J.A.C. 7:26C-7.

9. ACCESS. The Owner, and the subsequent owners, lessees and operators agree to allow the Department, its agents and representatives access to the Property to inspect and evaluate the continued protectiveness of the remedial action that includes this Deed Notice and to conduct additional remediation to ensure the protection of the public health and safety and of the environment if the subsequent owners, lessees and operators, during their ownership, tenancy, or operation, and the Owner fail to conduct such remediation pursuant to this Deed Notice as required by law. The Owner, and the subsequent owners and lessees, shall also cause all leases, subleases, grants, and other written transfers of an interest in the Restricted Areas to contain a provision expressly requiring that all holders thereof provide such access to the Department.

10. ENFORCEMENT OF VIOLATIONS.

i. This Deed Notice itself is not intended to create any interest in real estate in favor of the Department of Environmental Protection, nor to create a lien against the Property, but merely is intended to provide notice of certain conditions and restrictions on the Property and to reflect the regulatory and statutory obligations imposed as a conditional remedial action for this site.

ii. The restrictions provided herein may be enforceable solely by the Department against any person who violates this Deed Notice. To enforce violations of this Deed Notice, the Department may initiate one or more enforcement actions pursuant to N.J.S.A. 58:10-23.11, and N.J.S.A. 58:10C, and require additional remediation and assess damages pursuant to N.J.S.A. 58:10-23.11, and N.J.S.A. 58:10C.

11. SEVERABILITY. If any court of competent jurisdiction determines that any provision of this Deed Notice requires modification, such provision shall be deemed to have been modified automatically to conform to such requirements. If a court of competent jurisdiction determines that any provision of this Deed Notice is invalid or unenforceable and the provision is of such a nature that it cannot be modified, the provision shall be deemed deleted from this instrument as though the provision had never been included herein. In either case, the remaining provisions of this Deed Notice shall remain in full force and effect.

12A. EXHIBIT A. Exhibit A includes the following maps of the Property and the vicinity:

i. Exhibit A-1: Vicinity Map - A map that identifies by name the roads, and other important geographical features in the vicinity of the Property (for example, USGS Quad map, Hagstrom County Maps);

ii. Exhibit A-2: Metes and Bounds Description - A tax map of lots and blocks as wells as metes and bounds description of the Property, including reference to tax lot and block numbers for the Property;

iii. Exhibit A-3: Property Map - A scaled map of the Property, scaled at one inch to 200 feet or less, and if more than one map is submitted, the maps shall be presented as overlays, keyed to a base map; and the Property Map shall include diagrams of major surface topographical features such as buildings, roads, and parking lots.

12B. EXHIBIT B. Exhibit B includes the following descriptions of the Restricted Areas:

i. Exhibit B-1: Restricted Area Map - A separate map for each restricted area that includes:

(A) As-built diagrams of each engineering control, including caps, fences, slurry walls, (and, if any) ground water monitoring wells, extent of the ground water classification exception area, pumping and treatment systems that may be required as part of a ground water engineering control in addition to the deed notice

(B) As-built diagrams of any buildings, roads, parking lots and other structures that function as engineering controls; and

(C) Designation of all soil and sediment sample locations within the restricted areas that exceed any soil or sediment standard that are keyed into one of the tables described in the following paragraph.

ii. Exhibit B-2: Restricted Area Data Table - A separate table for each restricted area that includes either (A) or (B) through (F):

(A) Only for historic fill extending over the entire site or a portion of the site and for which analytical data are limited or do not exist, a narrative that states that historic fill is present at the site, a description of the fill material (e.g., ash, cinders, brick, dredge material), and a statement that such material may include, but is not limited to, contaminants such as PAHs and metals;

(B) Sample location designation from Restricted Area map (Exhibit B-1);

(C) Sample elevation based upon mean sea level;

(D) Name and chemical abstract service registry number of each contaminant with a concentration that exceeds the unrestricted use standard;

(E) The restricted and unrestricted use standards for each contaminant in the table;
and

(F) The remaining concentration of each contaminant at each sample location at each elevation.

12C. EXHIBIT C. Exhibit C includes narrative descriptions of the institutional controls and engineering controls as follows:

i. Exhibit C-1: Deed Notice as Institutional Control: Exhibit C-1 includes a narrative description of the restriction and obligations of this Deed Notice that are in addition to those described above, as follows:

(A) Description and estimated size of the Restricted Areas as described above;

(B) Description of the restrictions on the Property by operation of this Deed Notice;
and

(C) The objective of the restrictions.

ii. Exhibit C-2-A: Asphalt Cap as an Engineering Control: Exhibit C-2-A includes a narrative description of Asphalt Cap as an Engineering Control as follows:

(A) Description of the engineering control;

(B) The objective of the engineering control; and

(C) How the engineering control is intended to function.

iii. Exhibit C-2-B: Concrete Pads as an Engineering Control: Exhibit C-2 includes a narrative description of Concrete Pads as an Engineering Control as follows:

(A) Description of the engineering control;

(B) The objective of the engineering control; and

(C) How the engineering control is intended to function.

iii. Exhibit C-2-C: Vegetation Cap as an Engineering Control: Exhibit C-2 includes a narrative description of Vegetation Cap as an Engineering Control as follows:

(A) Description of the engineering control;

(B) The objective of the engineering control; and

(C) How the engineering control is intended to function.

13. SIGNATURES. IN WITNESS WHEREOF, Owner has executed this Deed Notice as of the date first written above.

ATTEST: 330 Commercial Avenue, LLC

_____ By _____

[Print name and title]

[Signature]

STATE OF NEW JERSEY SS.:
COUNTY OF MIDDLESEX

I certify that on _____, 20__, [Name of person executing document on behalf of Owner] personally came before me, and this person acknowledged under oath, to my satisfaction, that:

(a) this person is the _____ of 330 Commercial Avenue, LLC, the corporation named in this document;

(b) this person is the attesting witness to the signing of this document by the proper corporate officer who is the president of the corporation;

(c) this document was signed and delivered by the corporation as its voluntary act and was duly authorized;

(d) this person knows the proper seal of the corporation which was affixed to this document; and

(e) this person signed this proof to attest to the truth of these facts.

[Signature]

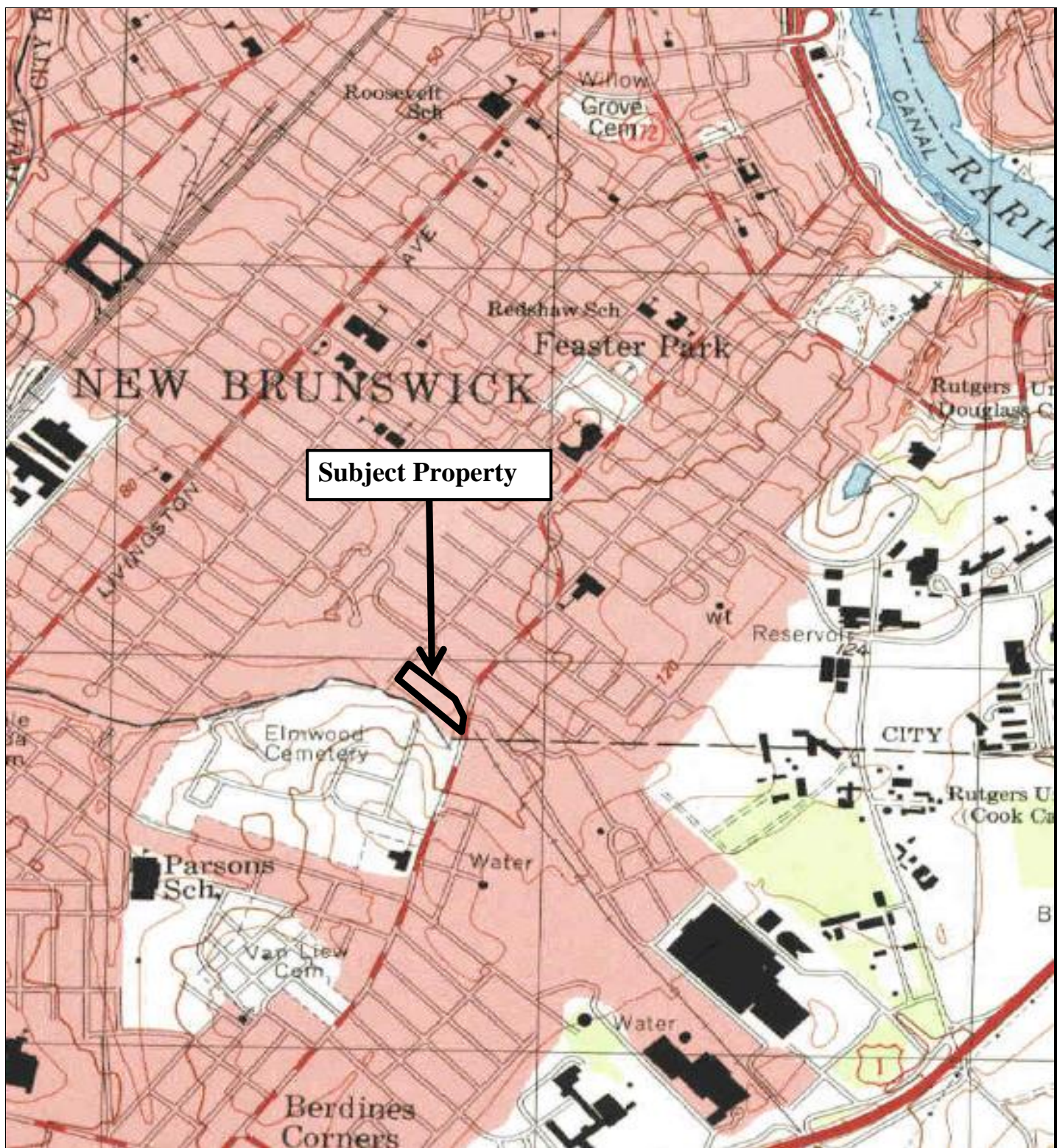
[Print name and title of attesting witness]

Signed and sworn before me on _____, 20__

_____, Notary Public

[Print name and title]

Exhibit A-1
Site Vicinity Map



Source: 1995 USGS Topographic Map New Brunswick Quadrant



RTP Environmental Associates, Inc
239 US Highway 22 East
Green Brook, New Jersey 08812

Figure 1
Site Location Map
330 Commercial Avenue
New Brunswick, NJ 08901

Scale: 1" = 1,200'

August 20, 2013

Exhibit A-2

Tax Maps and Metes and Bounds Description



RTP Environmental Associates, Inc
239 US Highway 22 East
Green Brook, New Jersey 08812

Exhibit A-2
Tax Map
Fulton Commercial
New Brunswick, New Jersey

Scale: 1" = 100'

Date: 2-12-13

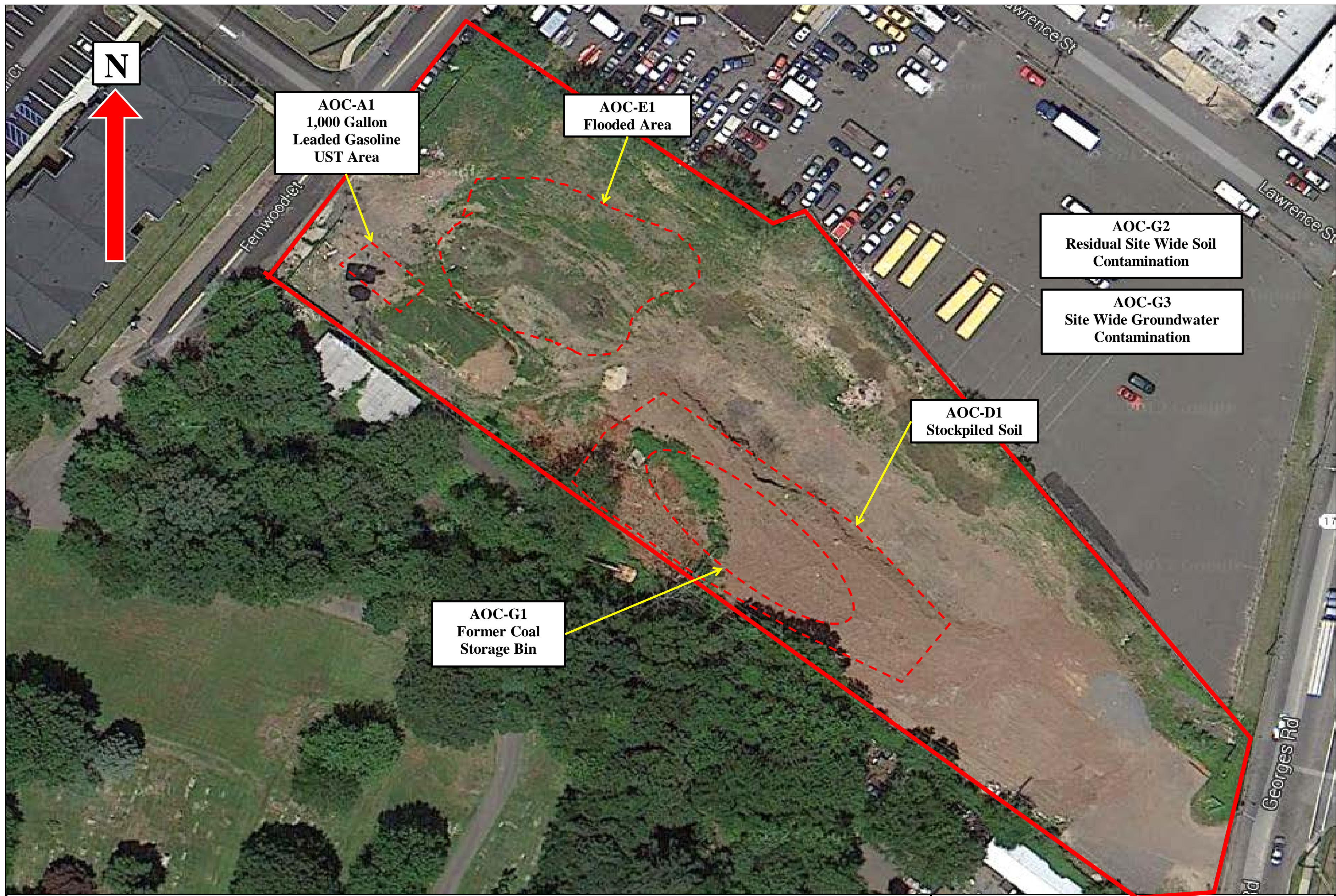
Meets and Bounds Description:

BEGINNING at the point on the Southeasterly Right of way line of Commercial Avenue (66 ft. wide), said point being located 151.64 ft. Southwesterly from the intersection of the aforesaid Southeasterly sideline of Commercial Avenue with the Southwesterly Right of way line of Lawrence Street (60 ft. wide), said beginning point being also described in Deed Book 3903 Page 433 thence running:

1. South 41 degrees 47 minutes 00 seconds East, a distance of 53.70 ft. to a point thence
2. Along a curve to the right, having a radius of 1457.84 ft. and an arc length of 521.18 ft. to a point thence
3. South 21 degrees 18 minutes 00 seconds East, distance of 17.28 ft. to point on the Northwesterly Right of way line of George's Road (60.00 ft. wide), thence
4. Along the aforesaid Northwesterly sideline of George's Road, South 20 degrees 50 minutes 00 seconds West, a distance of 92.62 ft. to a point thence
5. North 41 degrees 47 minutes 00 seconds West, a distance of 638.61 ft. to a point on the aforesaid Southeasterly sideline of Commercial Avenue thence
6. Along the aforesaid Southeasterly outh 22 degrees 34 minutes 51 seconds East, along same 179.30 feet to the Point and Place of BEGINNING.

BEING known and designated as Lot 1.02 in Block 292 and Lots 4 and 4.01 in Block 295 as shown on the Official Tax Map of the City of New Brunswick, Middlesex County, New Jersey, and commonly known as 330 Commercial Avenue, New Brunswick, NJ.

Exhibit A-3
Property Map



Legend

- = Site Boundary
- - - = AOC Boundary



RTP Environmental Associates, Inc
239 US Highway 22 East
Green Brook, New Jersey 08812

Exhibit A-3
Property Map
330 Commercial Avenue
New Brunswick, New Jersey 08901

Scale: 1" = 85'

August 20, 2013

Exhibit B-1-A
Restricted Area Map



Legend



Property Boundary



Area C - Vegetation Cap = 10 inches of clay followed by 6 inches of top soil and mulch/seed.



Area A - Asphalt Cap = certified clean soil and/or 6 inches of asphalt and subbase material.



Area B - Concrete Cap = certified clean fill and/or 6 inches of concrete/concrete slab.



RTP Environmental Associates, Inc
239 US Highway 22 East
Green Brook, New Jersey 08812

Exhibit B-1-A Capping Detail

Fulton Commercial
330 Commercial Avenue
New Brunswick, New Jersey
Date: 5-31-2018

Exhibit B-1-B

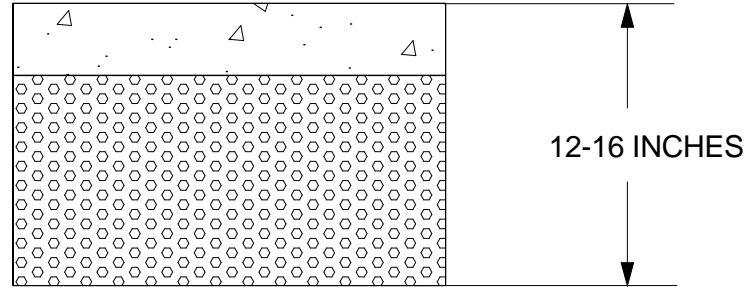
Restricted Area Soil Sample Locations Maps

Exhibit B-1-C
Capping Details

CONCRETE CAP

6 INCHES OF CONCRETE

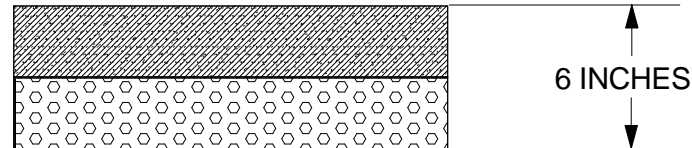
6-9 INCHES OF STONE / GRAVEL BASE
(CERTIFIED CLEAN FILL)



ASPHALT CAP

6 INCHES OF ASPHALT AND SUBBASE MATERIAL

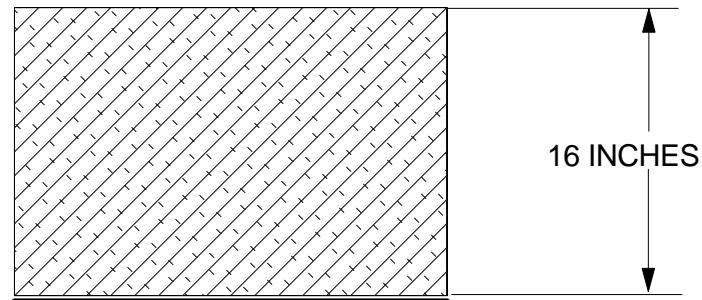
CERTIFIED CLEAN FILL



VEGETATION CAP

10 INCHES OF CLAY AND
6 INCHES OF TOP SOIL AND MULCH/SEED

FILTER FABRIC



Scale: As shown



RTP Environmental Associates, Inc.
239 U.S. Highway 22 East
Green Brook, New Jersey

Scale:
As shown

Drawn by: EK
Date: 5/31/2018

Exhibit B-1-C
CAP DETAILS
330 Commercial Avenue, New Brunswick, NJ
(Block 292.01, Lot 1.05)

Exhibit B-2
Restricted Area Data Tables

EXHIBIT B-2: RESTRICTED AREA DATA TABLES

TABLE 1

SOIL ANALYTICAL DATA SUMMARY TABLE

FULTON COMMERCIAL @ 330 COMMERCIAL AVENUE
330 COMMERCIAL AVENUE
NEW BRUNSWICK, NEW JERSEY 08901
NJDEP PI No. 244730

Sample ID	FA-1	FA-2	FA-1R	SWS-7	SWS-9	HD-3A	HD-4A	HD-3B	HD-5B	Residential Direct Contact Soil Remediation Standard (mg/kg)	Non-Residential Direct Contact Soil Remediation Standard (mg/kg)
Date Sampled	5/8/09	5/8/09	9/27/16	4/30/09	4/30/09	9/27/16	9/27/16	9/27/16	9/27/16		
Matrix	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil		
Sample Depth (feet)	0.0-0.5	0.0-0.5	0-0.5	6.0-6.5	3.0-3.5	0-0.5	0-0.5	3-3.5	3-3.5		
Units	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg		
Parameter: Semi-Volatile Organic Compounds											
Benzo(a)anthracene	<SRS	<SRS	<SRS	<SRS	<SRS	22.6	<SRS	<SRS	<SRS	5.0	17
Benzo(b)fluoranthene	<SRS	<SRS	<SRS	<SRS	<SRS	32.4	<SRS	<SRS	<SRS	5	17
Benzo(a)pyrene	1.8	3	1.44	1.1	0.62	19.6	0.979	1.13	0.782	0.5	2
Indeno(1,2,3-cd)pyrene	<SRS	1.1	<SRS	<SRS	<SRS	5.86	<SRS	0.738	<SRS	5	17
Dibenz(a,h)anthracene	<SRS	<SRS	<SRS	<SRS	<SRS	1.47	<SRS	0.259	<SRS	0.5	2
PCBs	<SRS	0.245	<SRS	<SRS	<SRS	<SRS	<SRS	<SRS	<SRS	0.2	1
PP Metals											
Lead	540	<SRS	<SRS	<SRS	<SRS	<SRS	<SRS	<SRS	<SRS	400	800

NOTES:

All other target compounds not listed had an analytical result of non-detect.

The standard provided for TPHCs is for Fuel oil No.2/diesel fuel.

ND = Compound not detected.

NA = Not Applicable/Not Analyzed

Analytical results in bold are above the NJDEP Soil Cleanup Standard.

EXHIBIT B-2: RESTRICTED AREA DATA TABLES

TABLE 2

PAGE 1 OF 4

SOIL ANALYTICAL PCB DATA SUMMARY TABLE

FULTON COMMERCIAL @ 330 COMMERCIAL AVENUE

330 COMMERCIAL AVENUE

NEW BRUNSWICK, NEW JERSEY 08901

NJDEP PI No. 244730

Sample ID	FB-01	FB-02	FB-06	FB-07	FB-08	FB-09	FB-10	FB-11	FB-12	FB-13	NJ Residential Direct Contact Soil Remediation Standard (mg/kg)	NJ Non-Residential Direct Contact Soil Remediation Standard (mg/kg)	NJ Default Impact to Ground Water Soil Screening Level (mg/kg)
Date Samples	6/13/06	6/13/06	6/13/06	6/13/06	6/13/06	6/13/06	6/13/06	6/13/06	6/13/06	6/13/06			
Matrix	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil			
Sample Depth (ft)	0.5-1	0.5-1	0.5-1	0.5-1	0.5-1	0.5-1	0.5-1	0.5-1	0.5-1	0.5-1			
Units	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg			
PCBS BY 8082	0.81	0.31	0.44	0.81	4.4	0.85	1.08	1.66	0.97	0.28	0.2	1	0.2

Sample ID	FDUP-01	FS-01-TT	FS-02-TT	FS-04-TT	FS-05-TT	FS-06-TT	FB-14-TT	FB-15-TT	FB-17-TT	FB-22-TT	NJ Residential Direct Contact Soil Remediation Standard (mg/kg)	NJ Non-Residential Direct Contact Soil Remediation Standard (mg/kg)	NJ Default Impact to Ground Water Soil Screening Level (mg/kg)
Date Samples	6/13/06	6/13/06	6/13/06	6/13/06	6/13/06	6/13/06	6/21/06	6/21/06	6/21/06	6/21/06			
Matrix	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil			
Sample Depth (ft)	0.5-1	0-0.5	0-0.5	0-0.5	0-0.5	0-0.5	1.5-2	1.5-2	1.5-2	1.5-2			
Units	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg			
PCBS BY 8082	0.6	0.65	0.11	0.46	0.79	2.73	0.35	1.4	0.6	0.9	0.2	1	0.2

Sample ID	FB-23-TT	FB-24-TT	FB-25-TT	FB-21-TT	FS-07-TT	FS-08-TT	FS-09-TT	FS-10-TT	FS-11-TT	FS-12-TT	NJ Residential Direct Contact Soil Remediation Standard (mg/kg)	NJ Non-Residential Direct Contact Soil Remediation Standard (mg/kg)	NJ Default Impact to Ground Water Soil Screening Level (mg/kg)
Date Samples	6/21/06	6/21/06	6/21/06	6/22/06	6/22/06	6/22/06	6/22/06	6/22/06	6/22/06	6/22/06			
Matrix	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil			
Sample Depth (ft)	1.5-2	1.5-2	1.5-2	1.5-2	0-0.5	0-0.5	0-0.5	0-0.5	0-0.5	0-0.5			
Units	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg			
PCBS BY 8082	1.2	1	0.57	1.29	2.7	3.9	5.1	1.35	2.05	1.57	0.2	1	0.2

NOTES:

ND= Not Detected

Yellow highlight and bold indicates exceedance of the NJ DIGWSSL and NJDEP Residential SRS

Gray highlight and bold indicates exceedance of the NJDEP Non-Residential SRS

Blue highlight and bold indicates that the value can be rounded down to the SRS or DIGWSSL

EXHIBIT B-2: RESTRICTED AREA DATA TABLES

TABLE 2

PAGE 2 OF 4

SOIL ANALYTICAL PCB DATA SUMMARY TABLE

FULTON COMMERCIAL @ 330 COMMERCIAL AVENUE
 330 COMMERCIAL AVENUE
 NEW BRUNSWICK, NEW JERSEY 08901
 NJDEP PI No. 244730

Sample ID	FS-14-TT	FS-15-TT	FS-16-TT	FS-17-TT	FS-18-TT	FB-32-TT	FB-33-TT	FB-35-TT	FB-38-TT	FB-39-TT	NJ Residential Direct	NJ Non-Residential Direct	NJ Default Impact to Ground Water Soil Screening Level (mg/kg)
Date Samples	6/22/06	6/22/06	6/22/06	6/22/06	6/22/06	6/28/06	6/28/06	6/28/06	6/28/06	6/28/06	Contact Soil Remediation Standard (mg/kg)	Contact Soil Remediation Standard (mg/kg)	
Matrix	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil			
Sample Depth (ft)	0-0.5	0-0.5	0-0.5	0-0.5	0-0.5	0.5-1	0.5-1	0.5-1	0.5-1	0.5-1			
Units	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg			
PCBS BY 8082	1.82	4.2	6.9	1.58	1.28	0.47	6.7	1.38	0.58	0.68	0.2	1	0.2

Sample ID	FS-29-TT	FS-30-TT	FS-31-TT	FS-33-TT	FSIM-01-TT	FSIM-03-TT	FSIM-04-TT	FSIM-05-TT	FSIM-06-TT	FSIM-08-TT	NJ Residential Direct	NJ Non-Residential Direct	NJ Default Impact to Ground Water Soil Screening Level (mg/kg)
Date Samples	6/28/06	6/28/06	6/28/06	6/28/06	6/28/06	6/29/06	6/29/06	6/29/06	6/29/06	6/29/06	Contact Soil Remediation Standard (mg/kg)	Contact Soil Remediation Standard (mg/kg)	
Matrix	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil			
Sample Depth (ft)	0-0.5	0-0.5	0-0.5	0-0.5	0-0.5	0-0.5	0-0.5	0-0.5	0-0.5	0-0.5			
Units	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg			
PCBS BY 8082	2.7	0.18	5.5	0.34	2.21	3	1.14	0.85	6.9	0.43	0.2	1	0.2

Sample ID	FSIM-09-TT	FSIM-10-TT	FSIM-13-TT	FSIM-15-TT	FSIM-16-TT	FSIM-17-TT	FSIM-18-TT	FB40-TT	FB41-TT	FDUP01-TT	NJ Residential Direct	NJ Non-Residential Direct	NJ Default Impact to Ground Water Soil Screening Level (mg/kg)
Date Samples	6/29/06	6/29/06	6/29/06	6/29/06	6/29/06	6/29/06	6/29/06	7/7/06	7/7/06	7/7/06	Contact Soil Remediation Standard (mg/kg)	Contact Soil Remediation Standard (mg/kg)	
Matrix	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil			
Sample Depth (ft)	0-0.5	0-0.5	0-0.5	0-0.5	0-0.5	0-0.5	0-0.5	0.5-1	0.5-1	0.5-1			
Units	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg			
PCBS BY 8082	0.3	0.39	0.33	0.27	0.77	0.57	0.36	0.35	0.27	0.37	0.2	1	0.2

NOTES:

ND= Not Detected

Yellow highlight and bold indicates exceedance of the NJ DIGWSSL and NJDEP Residential SRS

Gray highlight and bold indicates exceedance of the NJDEP Non-Residential SRS

Blue highlight and bold indicates that the value can be rounded down to the SRS or DIGWSSL

EXHIBIT B-2: RESTRICTED AREA DATA TABLES

**TABLE 2
PAGE 3 OF 4**

SOIL ANALYTICAL PCB DATA SUMMARY TABLE

**FULTON COMMERCIAL @ 330 COMMERCIAL AVENUE
330 COMMERCIAL AVENUE
NEW BRUNSWICK, NEW JERSEY 08901
NJDEP PI No. 244730**

Sample ID	FB45-TT	FB46-TT	FB53-TT	FB54-TT	FB59-TT	FB61-TT	FB63-TT	FB65-TT	FS40-TT	FS41-TT	NJ Residential Direct Contact Soil Remediation Standard (mg/kg)	NJ Non-Residential Direct Contact Soil Remediation Standard (mg/kg)	NJ Default Impact to Ground Water Soil Screening Level (mg/kg)
Date Samples	7/11/06	7/11/06	7/11/06	7/11/06	7/11/06	7/11/06	7/11/06	7/11/06	7/11/06	7/11/06			
Matrix	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil			
Sample Depth (ft)	0.5-1	0.5-1	0.5-1	0.5-1	0.5-1	0.5-1	0.5-1	0.5-1	0-0.5	0-0.5			
Units	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg			
PCBS BY 8082	3.9	0.25	0.26	1.08	0.32	0.68	0.52	0.66	4.4	1.65	0.2	1	0.2

Sample ID	FS42-TT	FS43-TT	FS45-TT	FS46-TT	FS47-TT	FS48-TT	FS49-TT	FS51-TT	FS52-TT	FB70-TT	NJ Residential Direct Contact Soil Remediation Standard (mg/kg)	NJ Non-Residential Direct Contact Soil Remediation Standard (mg/kg)	NJ Default Impact to Ground Water Soil Screening Level (mg/kg)
Date Samples	7/11/06	7/11/06	7/11/06	7/11/06	7/11/06	7/11/06	7/11/06	7/11/06	7/11/06	7/12/06			
Matrix	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil			
Sample Depth (ft)	0-0.5	0-0.5	0-0.5	0-0.5	0-0.5	0-0.5	0-0.5	0-0.5	0-0.5	0.5-1			
Units	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg			
PCBS BY 8082	1.42	2	0.48	0.33	0.5	0.33	0.59	1.02	2.37	2	0.2	1	0.2

Sample ID	FS56-TT	FS60-TT	FS63-TT	FB78-TT	FB86-TT	FB89-TT	FB90-TT	FB91-TT	FB92-TT	FB93-TT	NJ Residential Direct Contact Soil Remediation Standard (mg/kg)	NJ Non-Residential Direct Contact Soil Remediation Standard (mg/kg)	NJ Default Impact to Ground Water Soil Screening Level (mg/kg)
Date Samples	7/12/06	7/13/06	7/13/06	7/17/06	7/17/06	7/18/06	7/18/06	7/18/06	7/18/06	7/18/06			
Matrix	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil			
Sample Depth (ft)	0-0.5	0-0.5	0-0.5	0.5-1	0.5-1	0.5-1	0.5-1	0.5-1	0.5-1	0.5-1			
Units	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg			
PCBS BY 8082	0.26	0.34	9.1	0.3	0.79	0.36	0.43	1.9	2.6	1.11	0.2	1	0.2

NOTES:

ND= Not Detected

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Blue highlight and bold indicates that the value can be rounded down to the SRS or DIGWSSL

EXHIBIT B-2: RESTRICTED AREA DATA TABLES

TABLE 2
PAGE 4 OF 4

SOIL ANALYTICAL PCB DATA SUMMARY TABLE

FULTON COMMERCIAL @ 330 COMMERCIAL AVENUE
330 COMMERCIAL AVENUE
NEW BRUNSWICK, NEW JERSEY 08901
NJDEP PI No. 244730

Sample ID	FB94-TT	FB95-TT	FB96-TT	FS68-TT	FS69-TT	FS70-TT	FS72-TT	FS73-TT	FB97-TT	FB98-TT	NJ Residential Direct Contact Soil Remediation Standard (mg/kg)	NJ Non- Residential Direct Contact Soil Remediation Standard (mg/kg)	NJ Default Impact to Ground Water Soil Screening Level (mg/kg)
Date Samples	7/18/06	7/18/06	7/18/06	7/18/06	7/18/06	7/18/06	7/18/06	7/18/06	7/19/06	7/19/06			
Matrix	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil			
Sample Depth (ft)	0.5-1	0.5-1	0.5-1	0-0.5	0-0.5	0-0.5	0-0.5	0-0.5	0.5-1	0.5-1			
Units	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg			
PCBS BY 8082	1.07	2.1	2.02	1.25	1.03	1.03	1.63	0.59	0.97	0.91	0.2	1	0.2

Sample ID	FS74-TT	FS76-TT	FS77-TT	FS78-TT	FS58-TT	FS83-TT	FS84-TT	FS86-TT	FS88-TT	NJ Residential Direct Contact Soil Remediation Standard (mg/kg)	NJ Non- Residential Direct Contact Soil Remediation Standard (mg/kg)	NJ Default Impact to Ground Water Soil Screening Level (mg/kg)
Date Samples	7/19/06	7/19/06	7/19/06	7/19/06	7/20/06	7/20/06	7/20/06	7/20/06	7/20/06			
Matrix	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil			
Sample Depth (ft)	0-0.5	0-0.5	0-0.5	0-0.5	0-0.5	0-0.5	0-0.5	0-0.5	0-0.5			
Units	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg			
PCBS BY 8082	0.35	1.08	0.32	0.48	0.29	1.84	1.19	0.62	1.01	0.2	1	0.2

Sample ID	FS90-TT	FS91-TT	FB100-TT	FB101-TT	FB102-TT	FB103-TT	FB104-TT	FB105-TT	FS89-TT	NJ Residential Direct Contact Soil Remediation Standard (mg/kg)	NJ Non- Residential Direct Contact Soil Remediation Standard (mg/kg)	NJ Default Impact to Ground Water Soil Screening Level (mg/kg)
Date Samples	7/20/06	7/20/06	7/21/06	7/21/06	7/21/06	7/21/06	7/21/06	7/21/06	7/20/06			
Matrix	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil			
Sample Depth (ft)	0-0.5	0-0.5	0.5-1	0.5-1	0.5-1	0.5-1	0.5-1	0.5-1	0-0.5			
Units	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg			
PCBS BY 8082	0.54	1.52	0.29	0.95	1.52	1.45	1.77	1.24	0.37	0.2	1	0.2

NOTES:

ND= Not Detected

Yellow highlight and bold indicates exceedance of the NJ DIGWSSL and NJDEP Residential SRS

Gray highlight and bold indicates exceedance of the NJDEP Non-Residential SRS

Blue highlight and bold indicates that the value can be rounded down to the SRS or DIGWSSL

Exhibit C-1
Description of Restriction
(Deed Notice as Institutional Control)

(A) General Description of this Deed Notice

1. *Description and Estimated Size of Area*

Soil contaminated with PAH and PCBs (below 10 mg/kg) underlies the subject property, and therefore the Restricted Area is the entire property, which encompasses approximately 2.5 acres. The soil contamination is associated with the Historic Fill identified at the property, and off-site historical discharges, which occurred at the former Iron Mack site adjacent to the north. The Restricted Area includes will include the proposed buildings, asphalt driveway and parking areas, concrete sidewalks, and vegetated landscape areas. The restricted area is depicted on Restricted Area Map (Exhibit B-1-A).

2. *Description of Restrictions*

Through operation of this deed notice, no owner shall make or allow to be made, any alteration,improvement, or disturbance in, to, or about the Restricted Area which disturbs any engineering control or which creates an unacceptable risk of exposure of humans or the environment to contamination in the restricted Area without first obtaining the written consent of the NJDEP.

3. *Objective of Restrictions*

The objective of the institutional control is to ensure that the engineering control for thr Restricted Area (i.e., the permanent engineering control (Exhibit C-2-A through C-2-C) for the contaminated historic fill remains protective of public health and the environment for as long as the contamination exists above the concentration that would allow for unrestricted use, control human exposure to the Restricted Area, establish monitoring and maintenance requirements for the engineering control/area, and provide notification of the Restricted Area to future property owner/operators.

(B) Description of Monitoring

1. Biennial monitoring of conditions across the site will be conducted to confirm that any disturbances of the soil in the Restricted Areas did not result in unacceptable exposure to soil contamination.
2. Land use changes subsequent to the filing of the Deed Notice or the most recent biennial certification (whichever is more recent) will be evaluated in order to confirm that it remains consistent with the restrictions of the Deed Notice.
3. During the biennial certification process, a regulatory review will be conducted to determine if newly promulgated or modified requirements exist in relation to the maintenance of this Deed Notice. This proposed monitoring will ensure that newly promulgated or modified requirements of applicable regulations or laws that apply to the property are applied to the Deed Notice or the most recent biennial certification.
4. During the biennial certification process an order of magnitude analysis of analytical data will be conducted to determine if any newly adopted or modified regulations have caused impacted soils to be present at greater than 10-times the allowable concentrations. Based on this analysis an additional review will be conducted to assess the need to further delineate impacts on the property and to determine if the Deed Restrictions placed at the property remain sufficient to maintain the objectives of the Deed Notice. The proposed monitoring will ensure that if any new standards, regulations, or laws apply to the property that might necessitate additional sampling in order to evaluate the protectiveness of the remedial action (including this Deed Notice), the necessary sampling will be conducted.
5. Through implementation of the above inspection and maintenance, the engineering controls will maintain their integrity and will remain protective of the public health and safety and of the environment by limiting access to the site and preventing direct contact to underlying soil.
6. The results of all inspections and maintenance and any disturbance of the controls shall be documented in a logbook, which will be made available on-site to the NJDEP upon request. The logbook shall contain the self-inspection dates, name of inspector, and the results of the inspection and condition of the engineering controls with photo-documentation as appropriate.
7. During the biennial certification process an order of magnitude analysis of analytical data will be conducted to determine if any newly adopted or modified regulations have caused impacted soils to be present at greater than 10-times the allowable concentrations.

Based on this analysis an additional review will be conducted to assess the need to further delineate impacts on the property and to determine if the Deed Restrictions and Engineering Controls placed at the property remain sufficient to maintain the objectives of the Deed Notice as described in A3 above. The proposed monitoring will ensure that if any new standards, regulations, or laws apply to the property that might necessitate additional sampling in order to evaluate the protectiveness of the remedial action (including this Deed Notice), the necessary sampling will be conducted.

(C) Description of Biennial Certification

A biennial certification shall be prepared and submitted to the New Jersey Department of Environmental Protection, in a format or on a form to be provided by the New Jersey Department of Environmental Protection, that includes the following:

1. A monitoring report that describes the specific activities, pursuant to (A) and (B) above, conducted in support of the biennial certification of the protectiveness of the remedial action that includes this Deed Notice.
2. A determination that the engineering controls continue to operate as designed.
3. A determination that the remedial action that includes the engineering controls continues to be protective of the public health and safety and the environment.
4. Submission of the NJDEP's Institutional Control Biennial Certification Form to the appropriate NJDEP program in order to document the above monitoring activities (or other applicable NJDEP form).
5. Appropriate Site location information (Site Name, Address, Tax Lot and Block Number, Site Number, Case Number, Date of No Further Action Letter which included engineering/institutional controls).

Exhibit C-2

Narrative Description of Engineering Controls

(A) General Description of the Engineering Controls

(1) Description of Engineering Control

The Engineering Control for the Restricted Area is a surface cover that consists of landscaped, asphalt, and concrete areas. The engineering controls (cap details) for the Restricted Area are shown on Exhibit B-1-C and consist of the following

Exhibit C-2-A: Asphalt Cap as an Engineering Control

1. An impermeable macadam pavement is present and covers the majority of the exterior ground surface, and will serve as an engineering control. The macadam pavement consists of layers of compacted broken stones bound with asphalt made to withstand the traffic at the site. The asphalt cap is designated as Area A. The asphalt cap locations are depicted on Exhibit B-1-A Restricted Area and Engineering Control Map.
2. The macadam pavement will serve as a physical barrier between the contaminated subsurface soil and the ground surface.
3. The macadam pavement will prevent direct contact to the underlying contaminated soil by residents and onsite workers, or others present at the property.

Exhibit C-2-B: Concrete Pads as an Engineering Control

1. Several impermeable concrete walkways and sidewalks are present throughout the exterior portion of the property. The concrete cap in these areas is approximately 6 inches thick with additional 6 inches of subbase. Additionally, the existing on-site buildings are constructed on concrete. The concrete cap is designated as Area B. The concrete cap locations are depicted on Exhibit B-1-A Restricted Area and Engineering Control Map.
2. The concrete pads and concrete slab floors of the on-site buildings will serve as a physical barrier between the contaminated subsurface soil and the ground surface.
3. The concrete pads and concrete slab floors of the on-site buildings will prevent direct contact to the underlying contaminated soil by residents and onsite workers, or others present at the property.

Exhibit C-2-C: Vegetation Cap as an Engineering Control

1. Several areas covered with 10 inches of clay followed by 6 inches of top soil and mulch/seed are present at the site. The vegetation cap is designated as Area C. These areas are depicted on Exhibit B-1-A Restricted Area and Engineering Controls Map.
2. The 16 inches of clay and top soil will serve as a physical barrier between the contaminated subsurface soil and the ground surface.
3. The vegetation cap barriers will prevent direct contact to the underlying contaminated soil by residents and onsite workers, or others present at the property.

(2) Objective of Engineering Control

The objective of the Engineering Control is to prevent and/or reduce possible direct contact with contaminated historic fill.

(3) Intended Function of Engineering Control

As of the filing of this Deed Notice, the areas covered by the above described engineering controls would be used for residential purposes as apartment buildings, parkings for residents' vehicles, driveways, walkways, sidewalks, and landscaped area. All current and subsequent owners, operators and lessees will be advised of the above engineering controls and conditions and will be provided with copies of the Deed Notice pursuant to the Deed Notice provisions and N.J.A.C. 7:26E-8.

(B) Description of Operation and Maintenance

1. The property owner and/or operator will conduct annual monitoring of the engineering controls consisting of an annual inspection and evaluation of the engineering controls to determine their integrity, operability, and effectiveness. Inspections will be documented and all potential faults in the engineering controls will be photo-documented. All damage that has the potential to undermine the engineering controls integrity and/or effectiveness shall be repaired.
2. The annual monitoring described above will ensure that the engineering controls continue to function as designed and intended to protect the public health and safety and the environment by limiting access to the site and preventing direct contact to underlying soil.
3. Any alteration, excavation, or disturbance of the engineering controls will occur in a timely manner and will be addressed appropriately so as to maintain the integrity of the engineering control. Any earthwork planned at the property will be conducted in accordance with Items 7.A and 7.B of the Deed Notice.

4. Through implementation of the above inspection and maintenance, the engineering controls will maintain their integrity and will remain protective of the public health and safety and of the environment by limiting access to the site and preventing direct contact to underlying soil.
5. The results of all inspections and maintenance and any disturbance of the controls shall be documented in a logbook, which will be made available onsite to the NJDEP upon request. The logbook shall contain the self-inspection dates, name of inspector, and the results of the inspection and condition of the engineering controls with photo-documentation as appropriate.
6. During the biennial certification process an order of magnitude analysis of analytical data will be conducted to determine if any newly adopted or modified regulations have caused impacted soils to be present at greater than 10-times the allowable concentrations. Based on this analysis an additional review will be conducted to assess the need to further delineate impacts on the property and to determine if the Deed Restrictions and Engineering Controls placed at the property remain sufficient to maintain the objectives of the Deed Notice as described in A3 above. The proposed monitoring will ensure that if any new standards, regulations, or laws apply to the property that might necessitate additional sampling in order to evaluate the protectiveness of the remedial action (including this Deed Notice), the necessary sampling will be conducted.

(C) Description of Biennial Certification

A biennial certification shall be prepared and submitted to the New Jersey Department of Environmental Protection, in a format or on a form to be provided by the New Jersey Department of Environmental Protection, that includes the following:

1. A monitoring report that describes the specific activities, pursuant to (A) and (B) above, conducted in support of the biennial certification of the protectiveness of the remedial action that includes this Deed Notice.
2. A determination that the engineering controls continue to operate as designed.
3. A determination that the remedial action that includes the engineering controls continues to be protective of the public health and safety and the environment.

APPENDIX IV
REPORT CERTIFICATION